

OHSU Compliance Matrix

| Responsibilities: | | | | | | | | | | | |
|---|--|---|---|--|--|--|--|---|--|---|--|
| Definitions and Additional Requirements by Role: | OHSU Employee | Federal Work Study Employees (OHSU Students) | Postdoctoral Scholars paid on stipend | GME Residents/Fellows | Contracted Temporary Labor | Unescorted Visitor | OHSU Students | Volunteers | Escorted Visitor | Non Employee Vendor Personnel | Patient and/or Casual Visitor [of patients] |
| Examples | <ul style="list-style-type: none"> AFSCME-represented, ONA-represented, Unclassified, Faculty, Adjunct Faculty, Postdoctoral Researcher, Temporary (not through contract), Student Worker, & Federal Workstudy students from an outside institution (non-OHSU students) | <ul style="list-style-type: none"> OHSU Students that are registered as Federal Work Study Employees | <ul style="list-style-type: none"> Postdoctoral Trainees | <ul style="list-style-type: none"> GME Residents/Fellows | <ul style="list-style-type: none"> Temporary paid staff contracted through a staffing agency [RightSourcing] | <ul style="list-style-type: none"> Non Employee Licensed Independent Practitioner (LIP) Paid Non-OHSU Student Interns Unpaid Non-OHSU student (may or may not have contract in place)* Visiting Scholar/Scientist Unpaid Faculty (i.e. Affiliate Faculty or Volunteer Faculty) | <ul style="list-style-type: none"> OHSU Students registered with Office of Academic Affairs | <ul style="list-style-type: none"> Unpaid volunteers registered with a Volunteer Services Office Unpaid student interns* | <ul style="list-style-type: none"> Shadow Observer | <ul style="list-style-type: none"> Visitors (Unescorted or Escorted) paid by any outside agency or company in the business of supplying products, devices, equipment, and/or services that may be purchased for use by OHSU in performing clinical, research, education, or administrative operations | <ul style="list-style-type: none"> Patients (in-patient and out-patient) being seen by OHSU personnel, or visitors of such patients |
| Paid/Unpaid Status | <ul style="list-style-type: none"> Paid by OHSU payroll | <ul style="list-style-type: none"> Paid by Federal Work Study; overtime to be paid by OHSU hosting unit via OHSU payroll | <ul style="list-style-type: none"> Paid by OHSU Accounts Payable | <ul style="list-style-type: none"> Paid by OHSU Payroll | <ul style="list-style-type: none"> Paid by OHSU Accounts Payable, through RightSourcing | <ul style="list-style-type: none"> Paid by OHSU Accounts Payable; OR Paid by outside entity; OR Unpaid | <ul style="list-style-type: none"> Unpaid (exception: Graduate Students who may receive stipends paid by OHSU Accounts Payable) | <ul style="list-style-type: none"> Unpaid by any source (academic credit is acceptable) | <ul style="list-style-type: none"> Unpaid | <ul style="list-style-type: none"> Unpaid by OHSU | <ul style="list-style-type: none"> Not applicable |
| Approval | <ul style="list-style-type: none"> Follow the Delegation of Authority requirements for requisition and job offers | <ul style="list-style-type: none"> Unit leadership Complete a "Federal Work Study Position Notification" via the Registrar & Financial Aid Office | <ul style="list-style-type: none"> Follow the Delegation of Authority requirements for requisition and job offers | <ul style="list-style-type: none"> New hires coordinated by GME and HR Approved by Associate Dean for Graduate Medical Education | <ul style="list-style-type: none"> Hiring manager and fiscal authority approval and submit RightSourcing Temporary requisition form | <ul style="list-style-type: none"> Unit leadership | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Follow the approval process for the mission specific volunteer program (Healthcare Volunteer Services or Research & Academics Volunteer Services) | <ul style="list-style-type: none"> Unit leadership | <ul style="list-style-type: none"> Unit leadership | <ul style="list-style-type: none"> Not applicable |
| Human Resources Requirements | <ul style="list-style-type: none"> All employees must be in the HR Oracle database Entered via an HR New Hire Action All "New Hire paperwork" must be completed | <ul style="list-style-type: none"> Registered with the Registrar & Financial Aid Office | <ul style="list-style-type: none"> All postdocs must be in the HR Oracle database Entered via an HR New Hire Action All "New Hire paperwork" must be completed | <ul style="list-style-type: none"> All medical residents and fellows must be in the HR Oracle database Entered via an HR New Hire Action All "New Hire paperwork" must be completed | <ul style="list-style-type: none"> Temporary Agency workers are to be obtained and registered directly through RightSourcing Hiring manager and fiscal authority approval and submit RightSourcing Temporary requisition form | <ul style="list-style-type: none"> Follow guidelines in OHSU Visitors Policy (under Related Policies), following the Unescorted Visitors procedures | <ul style="list-style-type: none"> Registered with Office of Academics Affairs | <ul style="list-style-type: none"> Registration with a Volunteer Services Office is required | <ul style="list-style-type: none"> Follow guidelines in OHSU Visitors Policy (under Related Policies), following the Escorted Visitors procedures | <ul style="list-style-type: none"> Follow guidelines in OHSU Conflict of Interest and Gifts policies, OHSU Healthcare Vendor Representative policy, and OHSU Visitors policy. Varying cases will determine which policy process is to be followed. | <ul style="list-style-type: none"> Not applicable |
| Age and Contract Requirements and Release Form | <ul style="list-style-type: none"> Must be 16 years of age to be an employee at OHSU No contract requirements Privileged at OHSU if involved in patient care | <ul style="list-style-type: none"> Must be a registered OHSU student | <ul style="list-style-type: none"> Based on educational requirements | <ul style="list-style-type: none"> Must have contract with GME | <ul style="list-style-type: none"> Must be 18 years of age RightSourcing is the Vendor that manages all the approved staffing agencies on the program RightSourcing verifies that all OHSU compliance is completed before a contract employee can start | <ul style="list-style-type: none"> If the intern is participating in a defined training program administered through another institution, a contract must be setup through OHSU's Contract Services Department For interns under the age of 18, parental consent is required Minimum age for interns is 16 years of age unless otherwise indicated by the hosting unit If faculty, appointment with an OHSU School is required Privileged at OHSU if involved in patient care | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Healthcare Volunteer Services: Must be 14 years of age and in High school Research & Academic Volunteer Services: Must be 16 years of age If under the age of 18, parental consent required Volunteers are assigned to an OHSU employee for direct supervision. However oversight by a Volunteer Services Office may be required | <ul style="list-style-type: none"> If located in a clinical area, Escorted Visitor must complete the "Healthcare Observer and/or Shadow Guidelines and Agreement Form" For Escorted Visitors under the age of 18, parental consent is required Minimum age for Escorted Visitors is 16 years of age unless approved by Risk Management and Human Resources (no exceptions to 16 age requirement at Oregon National Primate Research Center) | <ul style="list-style-type: none"> If providing services via a vendor who is demonstrating a new product or service then the Non Employee Vendor Support Personnel must be identified in the contract Contracts must include (but are not limited to): Background Checks, Drug Tests, Competency Assessments and Training are to be completed and managed | <ul style="list-style-type: none"> Not applicable |
| Level of Supervision | <ul style="list-style-type: none"> Each employee has a supervisor Hosting unit is responsible for the employee and ensuring compliance with applicable OHSU policies | <ul style="list-style-type: none"> Each Federal Work Study employee must be assigned a direct supervisor | <ul style="list-style-type: none"> Each postdoc is supervised by a mentor in their hosting unit | <ul style="list-style-type: none"> Must have ACGME appropriate supervision at all times: Direct; Indirect with Direct Immediately Available; Indirect with Direct available, Oversight | <ul style="list-style-type: none"> Contractor labor must have an assigned supervisor | <ul style="list-style-type: none"> At the direction of the hosting unit Hosting unit is responsible for the Unescorted Visitor and ensuring compliance with applicable OHSU policies | <ul style="list-style-type: none"> As defined by the mission specific policies and guidelines | <ul style="list-style-type: none"> Healthcare Volunteer Services: Supervised by Volunteer Services staff, additional guidance may be provided by OHSU employees; Research & Academic Volunteer Services: Volunteers are assigned/mentored by an OHSU employee with additional oversight provided by Volunteer Services staff If under the age of 18, parental consent required. Volunteers are assigned to an OHSU employee for direct supervision. However oversight by a Volunteer Services Office may be required | <ul style="list-style-type: none"> Escorted Visitors have an employee contact assigned by the hosting unit The Escorted Visitor must be with their employee contact at all times Hosting unit is responsible for the Escorted Visitor and ensuring compliance with applicable OHSU policies | <ul style="list-style-type: none"> At the direction of the hosting unit Hosting unit is responsible for the Non Employee Vendor Support Personnel and ensuring compliance with applicable OHSU policies | <ul style="list-style-type: none"> Not applicable |

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|---|--|--|---|--|---|--|---|---|--|---|--|
| Background Check (BC) | <ul style="list-style-type: none"> Required; Completed through the designated BC process for the hosting unit | <ul style="list-style-type: none"> Required Completed through the designated BC process for the hosting unit | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required; refer to contract to determine if the BC is completed through the contract labor agency If BC's are not outlined in the contract then the BC is completed through the designated BC process for the hosting unit | <ul style="list-style-type: none"> Required Visitors whose assignment will span more than 30 days must be registered as Unescorted Visitors | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Not required for Escorted Visitors whose assignment spans less than 30 days Visitors whose assignment will span more than 30 days must be registered as Unescorted Visitors | <ul style="list-style-type: none"> Varying cases will determine which process is to be followed (Unescorted - background check required; Escorted - background check not required) | <ul style="list-style-type: none"> Not applicable |
| Drug Test (DT) | <ul style="list-style-type: none"> Required for those who will have direct patient care, safety-sensitive roles, or other circumstances as defined by Human Resources | <ul style="list-style-type: none"> Required for those who will have direct patient care, safety-sensitive roles, or other circumstances as defined by Human Resources | <ul style="list-style-type: none"> Required for those who will have direct patient care, safety-sensitive roles, or other circumstances as defined by Human Resources | <ul style="list-style-type: none"> Required for those who will have direct patient care, safety-sensitive roles, or other circumstances as defined by Human Resources | <ul style="list-style-type: none"> Required for those who will have direct patient care, safety-sensitive roles, or other circumstances as defined by Human Resources | <ul style="list-style-type: none"> Required for those who will have direct patient care, safety-sensitive roles, or other circumstances as defined by Human Resources | <ul style="list-style-type: none"> Required for students who will complete a clinical practicum as part of their education Completed by the School or Program | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Required for those who will have direct patient care, safety-sensitive roles, or other circumstances as defined by Human Resources | <ul style="list-style-type: none"> Not applicable |
| Office of Inspector General/General Services Administration | <ul style="list-style-type: none"> Required Completed as part of the BC process | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Required Completed as part of the BC process | <ul style="list-style-type: none"> Required Completed as part of the BC process | <ul style="list-style-type: none"> Required Completed through RightSourcing program | <ul style="list-style-type: none"> At the direction of the unit Hosting unit is responsible for the Unescorted Visitor and ensuring compliance with policy | <ul style="list-style-type: none"> Required Completed through the Integrity Office | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Required for all who have direct patient contact Hosting units are responsible for completing the OIG/GSA verification process | <ul style="list-style-type: none"> Not applicable |
| ID Badge | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Required | <ul style="list-style-type: none"> Not required | <ul style="list-style-type: none"> Follow guidelines in OHSU Healthcare Vendor Representative policy, and OHSU Visitors policy. Varying cases will determine which policy process is to be followed (Unescorted - ID badge required; Escorted - ID badge not required) | <ul style="list-style-type: none"> Not applicable |
| Privileging and Credentialing | <ul style="list-style-type: none"> Required for those employees and faculty who qualify to hold clinical privileges as members of OHSU's professional staff | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Required to have clinical privileges at OHSU if involved in patient care | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable |
| License / Certification and Education Verification | <ul style="list-style-type: none"> Defined at the job/position level Requires primary source verification | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Defined at the job/position level Requires primary source verification | <ul style="list-style-type: none"> Required as part of credentialing process | <ul style="list-style-type: none"> Required based on the job/position description Primary source verification completed by the contract labor agency | <ul style="list-style-type: none"> Defined at the position level Requires primary source verification | <ul style="list-style-type: none"> Not applicable, unless educational program requires license(s) / certification(s) and/or education | <ul style="list-style-type: none"> Defined at the volunteer position level | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Required based on the position being completed Requires primary source verification completed by hosting unit | <ul style="list-style-type: none"> Not applicable |
| Resuscitation Certifications (ex: BLS, ACLS, PALS) | <ul style="list-style-type: none"> Defined at the job/position level Verified by hosting unit | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Defined at the position level Verified by hosting unit | <ul style="list-style-type: none"> BLS required for all; ACLS for those involved in sedation | <ul style="list-style-type: none"> Required based on the job/position being filled Verification is completed by the RightSourcing | <ul style="list-style-type: none"> Defined at the position level Verified by hosting unit | <ul style="list-style-type: none"> Not applicable unless educational program requires it | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Not applicable | <ul style="list-style-type: none"> Defined at the position level Verified by hosting unit | <ul style="list-style-type: none"> Not applicable |
| Training / Orientation / Competencies | <ul style="list-style-type: none"> As required by job or position in accordance with local mission policy or guideline | <ul style="list-style-type: none"> As required by job or position in accordance with local mission policy or guideline | <ul style="list-style-type: none"> As required by position in accordance with local mission policy or guideline | <ul style="list-style-type: none"> As required by GME and the ACGME | <ul style="list-style-type: none"> As required by job or position in accordance with policy titled "Educational Requirements of OHSU Healthcare Workforce" | <ul style="list-style-type: none"> As required in accordance with local mission policy or guideline | <ul style="list-style-type: none"> As required in accordance with local mission policy or guideline | <ul style="list-style-type: none"> As required by assignment in accordance with local mission policy, guideline or volunteer services requirements | <ul style="list-style-type: none"> Must receive a copy of "Privacy: A Priority at OHSU – Guidelines for Visitors" if located in patient care areas | <ul style="list-style-type: none"> As required in accordance with local mission policy or guideline | <ul style="list-style-type: none"> Not applicable |
| Occupational Health <i>(Occupational Health reserves the right to reassess risk code status & requirements at anytime. Please consult Occupational Health with any questions)</i> | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 and by the JBT Health & Wellness Center | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 Verification of these requirements are outlined in the contract between OHSU and the contract labor agency | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 | <ul style="list-style-type: none"> OHSU Students follow the policies and procedures set forth by JBT Health & Wellness Center | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 | <ul style="list-style-type: none"> Dependent on the "Required Communicable Disease Screening and Immunizations" policy 03-30-130 | <ul style="list-style-type: none"> Not applicable |
| Record Retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> See your mission area policies on record retention | <ul style="list-style-type: none"> Not applicable |

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|---|--|--|---|---|--|---|---|---|---|--|--|
| Risk Requirements | <ul style="list-style-type: none"> Covered under OHSU existing lines of coverage Must request Off Campus Authorization (OCA) from Risk Management if training/working at another institution or non-OHSU location and if involved in patient care | <ul style="list-style-type: none"> Covered under OHSU | <ul style="list-style-type: none"> Covered under OHSU existing lines of coverage Must request Off Campus Authorization (OCA) from Risk Management if training/working at another institution or non-OHSU location | <ul style="list-style-type: none"> Covered under OHSU existing lines of coverage Must request Off Campus Authorization (OCA) from Risk Management if training/working at another institution or non-OHSU location | <ul style="list-style-type: none"> Insurance requirements as identified in OHSU's Professional Services contract (PSC) template | <ul style="list-style-type: none"> Provide own Professional Liability coverage if Unescorted Visitor is not paid by OHSU. If Unescorted Visitor is paid by OHSU, OHSU covers professional liability coverage (Healthcare only) Workers' Compensation coverage confirmation required if Unescorted Visitor is not paid by OHSU Must request Off Campus Authorization (OCA) if performing patient care if Unescorted Visitor is paid by OHSU | <ul style="list-style-type: none"> Covered under OHSU existing lines of coverage except workers' compensation (exception: Graduate students who receive stipends from OHSU are covered by workers' compensation) Must request Off Campus Authorization (OCA) from Risk Management if performing patient care off campus | <ul style="list-style-type: none"> Covered under OHSU existing lines of volunteer coverage | <ul style="list-style-type: none"> No insurance coverage provided by OHSU. No insurance required | <ul style="list-style-type: none"> Insurance requirements as identified in the contract OHSU's Professional Services contract (PSC) template or purchase order for goods and services | <ul style="list-style-type: none"> Not applicable |
| High-Risk and Restricted Area Access (e.g. Surgery Operating Rooms; Biosafety Level 3 Units, etc.) | <ul style="list-style-type: none"> Defined by job and position Work located in these areas must be defined in the employee's position description Refer to the Restricted area for information on access availability requirements | | | | | | | | | | <ul style="list-style-type: none"> Not applicable |
| Computer Access | <ul style="list-style-type: none"> Refer to the Information Security Directive and the Information Technology Group's User Account Website for information on access availability requirements. | | | | | | | | | | <ul style="list-style-type: none"> Not applicable |
| Parking | <ul style="list-style-type: none"> Anyone parking at OHSU shall adhere to OHSU policies related to parking. OHSU Community Members that are not patients or casual visitors are not permitted to park in patient or patient visitor areas. • For additional options on transportation to OHSU and for maps of the OHSU campus see our travel directions web page. | | | | | | | | | | <ul style="list-style-type: none"> Anyone parking at OHSU shall adhere to OHSU policies related to parking. These individuals should park in patient or patient visitor areas |
| NOTE | <ul style="list-style-type: none"> All unpaid interns fall under the volunteer category unless one of the following situations are true: The unpaid intern is performing duties outside the scope of volunteer duties covered by OHSU insurance lines of coverage; the unpaid intern does not meet the general eligibility for the given volunteer program; or if there is a specific contract in place with the unpaid intern's hosting institution. Other mission specific criteria may apply. For more information or questions, please contact a Volunteer Services Office. | | | | | | | | | | |