



Broward Health Medical Center
 Broward Health North
 Broward Health Imperial Point
 Broward Health Coral Springs
 Broward Health Weston
 Chris Evert Children's Hospital
 Broward Health Community Health Services
 Broward Health Physician Group

To: All Current and Future Contractors
 From: Broward Health – Department of Learning/Clinical Education
 Date: October 2016

In order to assist you in meeting the regulatory educational requirements for Broward Health and in alignment with Joint Commission and CMS mandates, Broward Health has loaded multiple educational programs onto our Internet Site (www.browardhealth.org) to facilitate your employees (contractor's) compliance. These programs are web based and interactive which link to an exam and subsequent certificate of completion. Educational Programs which offer contact hours will require a minimal processing fee since each regional clinical education department must process the contact hours via CE Broker and issue a certificate for Continuing Education Credit if the participant wishes to obtain contact hour credit for the program.

All internet based educational programs do have a certificate of completion which is free to the individual. Below, please reference the clinical check list and Education requirements (**Attachments A & B**). This is in addition to the general contractor requirements which are identified in the Vendor Package. Web page snaps shots identify the path to the web page. You must select the appropriate category which you will be fulfilling and complete each link as indicated. Please note, the requirements for regulatory bodies are constantly being modified and Broward Health Department of Learning is working to keep the learning modules up to date and provide you with the tools you need to be compliant as our partners in patient care. Thank you. If you have any questions, you may contact the Regional Clinical Education Departments at the numbers below.

Broward Health Medical Center954 355-4790
 Broward Health Coral Springs954-344-3363
 Broward Health Imperial Point954-776-8850
 Broward Health North954-786-6930
 Broward Health Corp Department of Learning.....954-888-3515



**HUMAN RESOURCE ADMINISTRATION
POLICIES AND PROCEDURE MANUAL**

POLICY #:	HRAM 2.14		
SUBJECT:	HR Guidelines for Regulatory Compliance for Agency/Contracted Personnel	EFFECTIVE DATE:	7/1997
SPONSOR:	HR	REVISED:	7/2000, 7/2003, 1/2005, 2/2008, 12/2008, 6/2009, 11/2014
APPROVED:	_____ SVP/CHRO, Dionne Wong	APPROVED FOR USE:	System-wide

PURPOSE: To provide mechanisms for agency and contracted personnel to satisfy regulatory agency standards.

GUIDELINES:

I. CONTRACT ACCOUNTABILITY: Any and all agreements between Broward Health and an organization which results in any of the following described business relationships with agency and contracted personnel, must clearly establish that said organization will be held accountable for meeting all applicable TJC and/or other regulatory requirements.

II. DEFINITION OF TERMS

AGENCY PERSONNEL: Defined as non-Broward Health employed workers who are furnished on a per diem or irregular basis by an external agency to perform a specific function at one of Broward Health facilities. These workers are directly employed by the agency and receive their pay and benefits directly from the agency.

CONTRACTED SERVICES: Defined as non-employee personnel who perform services on-site at our facilities and/or provide services pursuant to a contract between Broward Health and the provider.

INDEPENDENT CONTRACTORS: Defined as an individual(s) with a direct contractual relationship with Broward Health for a “defined contractual period of time” and one who is not obtained through an agency or outside contracted service. Individual clinical services such as: surgical first assists or orthopedic technicians.

SPECIAL NOTE: Professional Contracted Services that do not practice within the physical environment of a Broward Health Facility may be exempted from specific aspects of this policy. At a minimum, the professional contracted services individuals must comply with all aspects of professional licensure requirements if applicable, OIG requirements, Broward Health Code of Conduct and all HIPAA and privacy policies.

1. All contracted agency who work within the physical environment of a Broward Health Facility are required to provide a signed profile in accordance with the contract agreement on personnel furnished by their agency/contract services ensuring that the supplemental personnel member being furnished to Broward Health facility has been screened and meet all requirements of the job. This profile may be changed to be specific to the unit/department requesting the agency employee (Appendix A).
2. All agency, contracted individuals and independent contracted personnel working within the physical environment of a Broward Health Facility are oriented to Broward Health and the department/unit they will be working in through the following methods:
 - a. **Broward Health Orientation** – All agency, and contracted personnel are required to complete the Broward Health Orientation materials and documents available on via the Broward Health Web Pages located at www.Browardhealth.org, before the first scheduled worked shift at any Broward Health facility. The personnel must sign all documents provided on the web which are to be placed in the agency personnel's Broward Health file. Additional signed documentation may be required for each agency/contracted individual for access to any computer or electronic information system.
 - b. **Facility/Department/Unit Orientation** – All agency and contracted personnel are oriented to their facility/department or unit during their first day of work. Refer to Clinical Education/ A Practical Guide to Competency Assessment for Broward Health Leaders” Handbook for department specific template.
 - c. **Annual Reorientation & Regulatory/Mandatory Updates** – All agency and contracted personnel who continue to work at Broward Health are required to complete all Broward Health mandated annual updates which includes but is not limited to: Annual Environment of Care & HIPAA Updates which are available via the Broward Health Web Pages as well as furnishing proof of licensure and appropriate competencies.
3. **Competency/Performance Assessment:**
 - a. Proof that the agency and contracted personnel (including populations served specific competencies) must be provided to Broward Health at the time the agency and/or independent contracted personnel reports to work.
 - b. Competency assessments (including population served specific competencies, if applicable) must be completed on agency and contracted personnel after the initial shift by Broward Health and thereafter annually by the contracted services company and or designee for the independent contractor. Performance appraisals will be conducted by the agency/contracted Service Company (their employer) according to agency services' policies for all agency and contractors.
 - c. Performance appraisals will be made available to Broward Health upon request within 24 hours and/or during random audits.

- d. Full/Complete Agency personnel files Do Not need to be kept nor monitored by the organization/department utilizing them. However, Full/Complete Agency/Contract/Independent Contractor personnel files must be accessible by Broward Health Administration (designee) upon request within 24 hours and/or during random audits. Broward Health will maintain, at a minimum, proof of orientation, licensure/credentials validation and on-going competency and licensure/certification validation on site.

4. **COMPLIANCE & FILE MAINTENANCE** – The individual manager(s) utilizing and/or supervising the agency and contracted personnel is(are) responsible for establishing and maintaining the education file as well as ensuring compliance with all policy requirements listed. (See Exhibit A)

The education file includes but is not limited to:

- Primary source license verification (if applicable)
- Supportive Identification (Passport, Driver's License or State ID)
- Signed acknowledgment of Job Description
- Initial assessment of competency/evaluation
- Evidence of completion of Broward Health Orientation and Broward Health General Compliance Program & Certification
- Signed confidentiality and Data Security Forms
- Verification from contracting company - proof of 10 panel negative drug screen
- Verification from contracting company – level I background check (level II background check is required for pediatric areas and behavioral health)
- Verification of initial health screening :”free of communicable diseases”

Annually, the education file must be updated to include:

- Primary source license verification (renewal) if applicable
- Verification of annual health screening
- Evidence of completion of all Broward Health Annual Environment of Care & HIPAA and other assigned updates. These materials are available via the Broward Health Web Pages.
- Annual assessment of competency/evaluation

- III. **INDEPENDENT CONTRACTORS:** By the nature of their "independent" contractual relationship defined by IRS, assessment of Independent Contractor's performance is measured by the most appropriate person who can monitor the outcomes of the services contracted. Assessment and competency is measured, at the end of the first worked shift at Broward Health and prior to renewal of the contract or annually whichever comes first. (See Attachments A, B, & C). Employees/managers of similar disciplines must evaluate the independent contractor's competencies in the area of their expertise. For example the Orthotists' or Prosthetics' would be evaluated by the Rehab Department Manager or their designee since this job category does not exist in the Broward Health employee category).

POLICY #
HRAM 2.14

SUBJECT: HR Guidelines for Regulatory Compliance
for Agency/Contracted Personnel

HR
ADMINISTRATION

Attachments: Forms

Distribution: HR Personnel & System Management

Authors: Human Resource Team & Legal Council

ATTACHMENT A



Broward Health
AGENCY/CONTRACTOR EMPLOYEE PROFILE, page 1

Name of Contracted Personnel _____ **Skill Type** _____

Name of Agency: _____

Items Required	Received Yes	Received No	Renewal/Expiration Date	Comments
Required credentials Licensure/Certification (See Job Description)- Clinical Personnel - Refer to section II for additional Credential Requirements <ul style="list-style-type: none"> • Primary Source License and Verification • CPR if applicable 				
<ul style="list-style-type: none"> • Supportive ID Documentation 				<input type="checkbox"/> Passport, <input type="checkbox"/> DL <input type="checkbox"/> State ID
<ul style="list-style-type: none"> • Reviewed list of excluded individuals/entities (LEIE) via the online database. http://www.oig.hhs.gov • Completed National Sexual Predator/Offender Search Verification http://Offender.fdle.state.fl.us 				
<ul style="list-style-type: none"> • Contracting Company Verification of Background check with a minimum of ten year criminal history – Level I , Level II background screen for behavioral health and pediatric areas. 				
<ul style="list-style-type: none"> • Signed Acknowledgement of Job Description 				N/A for contracted vendors
<ul style="list-style-type: none"> • Initial Shift Assessment of Competency/ Evaluation 				
<ul style="list-style-type: none"> • Orientation Checklist 				N/A for contracted vendors
<ul style="list-style-type: none"> • Evidence of Completion : • General Orientation Materials • BH Orientation & Test • BH Risk Management • General Compliance Training • CIA Compliance Training • Code of Conduct Training • Compliance & Ethics Policies and Procedures • Code of Conduct Training, Module II • Compliance & Ethics Policies and Procedures Training, Module II • Flu Vaccination Education 				
<ul style="list-style-type: none"> • Signed Confidentiality & Data Security Form 				
<ul style="list-style-type: none"> • Contracting Company Verification of negative ten (10) panel Drug Testing (in accordance with Drug Free Workplace Standards) 				
<ul style="list-style-type: none"> • Verification of Initial Health screening (free of any communicable diseases, Rubella, Measles, Mumps and any other vaccinations. 				

Hepatitis series if needed)				
<ul style="list-style-type: none">• Provide proof of completed Mantoux (Also known as Purified Protein Derivative "PPD) test within the past six months and annually thereafter.				



Broward Health
AGENCY/CONTRACTOR EMPLOYEE PROFILE, page 2

Name of Contracted Personnel _____ **Skill Type** _____

Name of Agency: _____

Items Required	Received Yes	Received No	Renewal/Expiration Date	Comments
ANNUALS				
<ul style="list-style-type: none"> • Verification of annual Health Screening including PPD 				
<ul style="list-style-type: none"> • Evidence of completion of all Broward Health Annual Updates: • Broward Health Orientation • General Compliance Training • CIA Compliance Training • Code of Conduct Training • Compliance & Ethics Policies and Procedures • Code of Conduct Training, Module II • Compliance & Ethics Policies and Procedures Training, Module II <p>And others as required by BH region Flu Vaccination Education and Accept/Declination Form</p>				
<ul style="list-style-type: none"> • Facility Required Annual Policy Reviews 				
<ul style="list-style-type: none"> • Annual Assessment of Competency/Evaluation 				
<ul style="list-style-type: none"> • License Verification (renewal) 				

ATTACHMENT B

Figure 1 Finding the Orientation Requirements: www.browardhealth.org

SELECT Broward Orientation at the bottom of the page

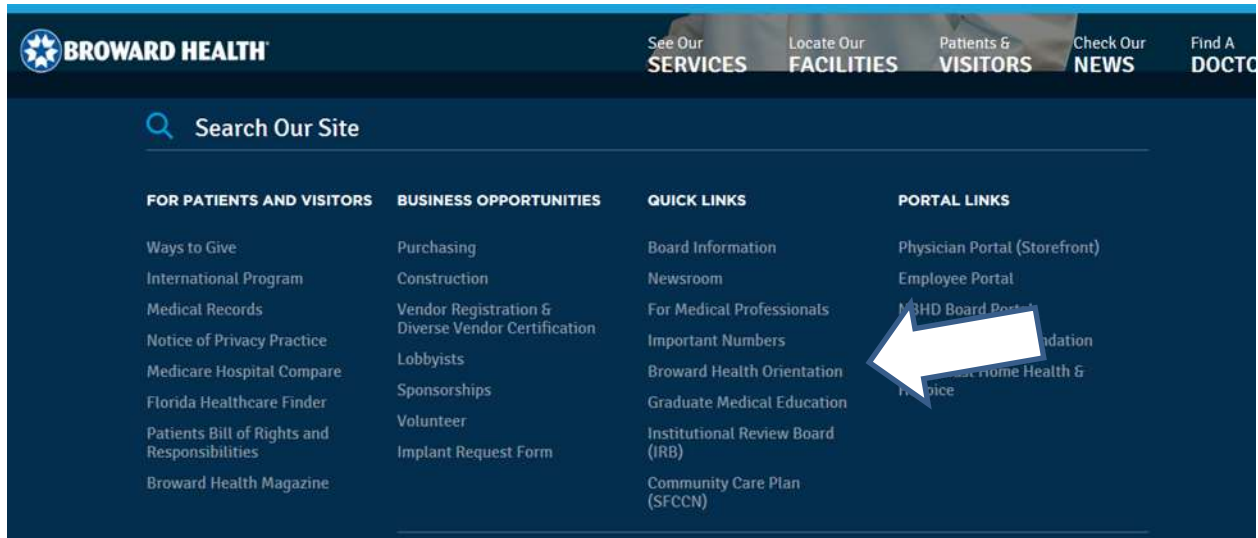


Figure 2

Here are the Orientation Requirements!



Figure 3

Select YOUR requirements page.



The image shows a screenshot of a careers website. At the top, there is a photograph of two surgeons in an operating room. Below the photo is a navigation menu with the following items: Summary of Benefits Overview, BIMC Pharmacy Residency (PGY1) Program, Broward College Upper-Level (BUN) Scholarship Program, Broward College Associate of Science Scholarship Program, Medical Residency Program, Nursing Annual Reports, Orientation Requirements (highlighted in blue), Allied Health Practitioner, Contractor and Student Orientation, Allopathic Medical Student Orientation, Construction / Engineering Orientation, Non-Clinical Support Staff / Volunteer / Intern Orientation, and Nurse Contractor / Traveler / Agency Orientation. The main content area is titled 'Orientation Requirements' and lists several categories: 'Allied Health Practitioner, Contractor and Student Orientation', 'Allopathic Medical Student Orientation', 'Construction/Engineering Orientation', 'Non-Clinical Support Staff and Volunteer/Intern Orientation', 'Nurse, Contractor/Traveler/Agency Orientation', 'Nursing Instructor and Student Orientation', and 'Osteopathic Medical Student Orientation'. Below this, there are three sections: 'Chris Evert Children's Hospital' (with a sub-link for 'Chris Evert Children's Hospital Student/Volunteer'), 'Broward Health International' (with a sub-link for 'Broward Health International'), and 'Medical Staff and Allied Health Professional Applicants – Orientation and Education' (with a sub-link for 'Medical Staff and AHP Applicants'). A blue arrow points from a callout box to the 'Orientation Requirements' section. The callout box contains the text 'Click to select appropriate audience/page' and a green circle with the number '#3'.

ATTACHMENT C

Educational Requirements for Agency/Contracted Staff (updated 10/2016)

All Staff (clinical or non -clinical as well as licensed or unlicensed) need at a minimum:	List Date Completed for Each Module	Clinical (Non-Nursing Staff) need the following in addition to the minimum requirements listed to the left:	List Date Completed for Each Module
<p>Broward Health Orientation (Annual) BH Annual Risk Management Course (Annual) Broward Health Compliance Training</p> <ul style="list-style-type: none"> • General Compliance Training • CIA Compliance Training • Code of Conduct Training • Compliance & Ethics Policies and Procedures • Code of Conduct Training, Module II • Compliance & Ethics Policies and Procedures Training, Module II <p>FLU Vaccination Course (Annual) Hand Hygiene (Annual) Cultural Sensitivity in Healthcare (Annual) Team Collaboration Course (Annual Team Component – Title May Vary)</p>		<p>Current Licensure Required Education- Per the State Licensing Board</p> <p>Current American Heart Association BLS card (every 2yrs)- Expiration Date: ACLS, PALS, or NRP (based on BH equivalent Job Description and population)-(every 2 yrs.) SBAR and Stroke Awareness (annual) Stroke Awareness</p>	
<p>Clinical Nursing Staff (Non-monitored, Non-Critical Care Areas) need the following in addition to the minimum listed for all staff above:</p>	<p>List Date Completed for Each Module</p>	<p>Clinical Nursing Staff (Cardiac monitored, Critical Care, or Perioperative Areas) need the following in addition to the minimum listed for all staff above and to the left:</p>	<p>List Date Completed for Each Module</p>
<p>Current Licensure Required Education- Per the State Licensing Board</p> <p>Current American Heart Association BLS card (every 2 yrs)- Expiration Date: Unit-based Skills Competency Validation (Initial and Annual per specialty area): Restraints Competency Validation (Annual): Recognition of Impaired Practitioners (every 3yrs) Dysphagia (Annual at BHCS only) Stroke Awareness SBAR Awareness (Annual) Plum A+ (One-time only)</p> <p>Every three years for the following courses:</p> <ul style="list-style-type: none"> Anticoagulation Course Blood Administration Course IV Medication Administration Pain Management Living, Dying & Death Impaired Practitioner 		<p>ACLS, PALS, or NRP (based on BH equivalent Job Description and population) (every 2 yrs.) Sedation Course (every 2 yrs.) Perioperative Nurses (above plus these courses):</p> <ul style="list-style-type: none"> Compressed Gas Cylinder Safety (Annual) Formaldehyde (Annual) Laser Safety (Annual) 	

