

This policy applies to: <input checked="" type="checkbox"/> <i>Stanford Hospital and Clinics</i> <input checked="" type="checkbox"/> <i>Lucile Packard Children’s Hospital</i>	Last Approval Date: March 2010
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I. PURPOSE

The purpose of this policy is to establish requirements for individuals who want to observe a procedure at Stanford Hospital and Clinics or Lucile Packard Children’s Hospital or their affiliates. This policy is to help ensure that Protected Health Information (PHI) is used and/or disclosed appropriately and that SHC/LPCH policies are followed.

II. DEFINITIONS

- A. Hospital – Stanford Hospital and Clinics and Lucile Packard Children’s Hospital
- B. Host – The individual who acts as a sponsor to the observer and is responsible for the observer’s conduct. Typically the Host has requested or agreed to allow the observer to watch a particular procedure, to accompany a health care provider on rounds or observe SHC/LPCH clinical practice. The Host must be an employee of SHC/LPCH or SoM and/or a physician with current Medical Staff privileges. The Host is responsible for making sure that the observer completes the Observer Attestation Agreement and follows SHC/LPCH policies.
- C. Visiting Observer – A visitor to SHC and/or LPCH who will be watching patient care and administrative functions for medical or professional education, or training. Observers must be at least eighteen (18) years old or in an approved structured SHC/LPCH or program. An observer may not participate in any patient care activities. An observer should be supervised by an appropriate SHC/LPCH staff member at all times and not be left unattended in clinical areas.

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III. POLICY STATEMENT

It is the policy of Stanford Hospital and Clinics and the Lucile Packard Children's Hospital to permit approved individuals to be present in the Hospitals to observe patient care activities as part of the Hospital's mission to educate and train, as long as the observation is done under supervision and sponsorship, and in a manner which does not compromise or interfere with patient care or with the formal training provided to others at these Hospitals.

In an effort to further improve patient awareness and safety a hospital wide policy has been established for both LPCH and SHC to ensure patient safety and confidentiality when visiting observers are present. As part of the visitor observer access process, defined safeguard measures including verification by sponsoring department (i.e. Host) that the observer has completed the Visiting Observer Attestation Agreement and procurement of a visitor badge has been obtained. The Host, or a delegate, must accompany the observer at all times.

These are in addition to the already mandatory requirements of the patient's consent in the patient's medical record if the observation is not for training purposes.

It is the sole responsibility of the Host (i.e. clinical faculty member [or medical staff member]) to gather this information, provide a copy of the completed Visiting Observer Attestation Agreement to SHC/LPCH Security, to OR administration, if the observation will occur in the OR, and maintain a copy within department.

IV. SCOPE OF POLICY

This policy incorporates the following types of interactions:

1. Visiting professors and/or medical personnel who are not involved in SHC/LPCH research or volunteer activities;
2. Individuals who are interested in a medical or residency/fellowship program at SHC/LPCH;
3. An adult designated by the legal guardian may accompany a child in to the surgery suite and stay for the anesthesia induction. The patient's immediate family (even if they are Hospital or University employees) are not allowed to observe family members in the

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operating rooms or cath angio lab;

This policy does **not** apply to the following situations:

1. Media or publicity observations where filming, photographing or videotaping is involved (See Photographing-Videotaping-Other Imaging Policy)
2. Pharmaceutical, medical device company or industry representatives who will be participating in a Hospital procedure (See Vendor Management Policy and Industry Interactions Policy)
3. Pharmaceutical, medical device or industry marketing and sales activities. (See Vendor Management Policy and Industry Interactions Policy)
4. Visitors who are present to visit friends and family members in the clinics or on the units (See Visitor Policy)

V. PROCEDURES

- A.. The request for observation must be initiated by the Host. The Host will follow the Host guide.
- B. All Visiting Observers will be required to complete the Visiting Observer Attestation Agreement prior to the observation which verifies that the observer has reviewed the following:
 1. SHC/LPCH's Code of Conduct Policy;
 2. HIPAA Guidelines for Visiting Observers or completed HIPAA training at his/her current place of employment or sponsoring entity;
- C. The completed Visiting Observer Attestation Agreement must be submitted to the Stanford University Medical Center Security Services Photo ID office to obtain a Visitor badge.
 1. Host sponsored visitor badges can only be processed during the Photo ID hours of operation (Monday – Friday, 7:30 a.m. – 4:30 p.m.)

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2. Photo ID reserves the right to deny issuance of Host sponsored visitor badge if authorizing signatures are not obtained.
 3. Verbal telephone authorization may be substituted for physical signatures if needed.
 4. The cost for the visitor badge will be charged to the account that is identified on the Visiting Observer Attestation Agreement.
- D. The Visiting Observer is required to report to the Hospital's Security Services Photo ID office to have identification verified (i.e. Driver's License, Government issued identification card, Passport) and photo taken for the visitor badge.
1. The visitor badge will display the logo of the hospital, VISITOR, in bold letters, the department or division sponsoring the individual, the name of the sponsored visitor, a portrait photo of the visitor and the date of expiration.
 2. The visitor badge will be printed with a solid colored background thereby making the badge distinct from that of an employee. The color of the badge will be changed every six (6) months for security purposes.
 3. The Visiting Observer must wear the visitor badge at all times when on Stanford University Medical Center property. It must be worn upon the visitor's person above the waist such that it can be readily viewed. The badge cannot be turned backward or otherwise obstructed by any other badge or portions of garment.
 4. Anyone displaying an expired visitor badge will be required to return to their Host for authorization to continue to visit, and resubmit the required documents identified above.
 5. Expired badges should be returned to Security Services Photo ID for proper disposal.
- E. Visiting Observers to the Operating Room (OR) and Cath Angio Lab are required to check-in with OR and Cath Lab Administration prior to the observation.

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- F. If the Visiting Observer requires CAS card access to the OR, the Host sponsoring the Visiting Observer must complete the CAS Access System Maintenance Form and the appropriate charge will be placed on the department's account identified in the Visiting Observer Attestation Agreement.
1. The CAS cards are preprogrammed proximity cards that when presented to a card reader at a door will unlock the door.
 2. The CAS cards must be returned at the end of the visit so that it may be reissued to another Visiting Observer. The card provides for no other facility access.
 3. OR Administration will be responsible for the issuance and maintenance of the CAS cards. In the event that a CAS card is not returned or is determined to be lost, OR Administration is responsible for informing Security Photo ID that the card should be disabled. The Host department's account as identified in the Visiting Observer Attestation Agreement will be charged the cost of the lost or unreturned CAS card. Additional CAS cards can be provided to the OR Administration upon request.
 4. OR Administration may deny access to any Visiting Observer at any time, particularly if patient care or departmental operations may be compromised by the presence of the Visiting Observer.

VI. RELATED DOCUMENTS

- A. SHC-LPCH Code of Conduct Policy
- B. SHC-LPCH Vendor Management Policy
- C. Medical Staff Code of Professional Behavior
- D. Industry Interactions Policy

VII. APPENDICES

- A. Visiting Observer Attestation Agreement

VIII. DOCUMENT INFORMATION

- A. Legal Authority/References
 1. 45 CFR 164.501, et. seq.

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- B. Author/Original Date
Compliance Department/Privacy Office, July 2006
- C. Gatekeeper of Original Document
Compliance Policy Manual, Compliance Department
- D. Distribution and Training Requirements
 1. This policy resides in the Compliance Manual of Stanford Hospital and Clinics.
 2. New documents or any revised documents will be distributed to Compliance Manual holders. The department/unit/clinic manager will be responsible for communicating this information to the applicable staff.
- E. Review and Renewal Requirements
This policy will be reviewed and/or revised every three years or as required by change of law or practice.
- F. Review and Revision History
 August 2006, LPCH Medical Board
 August 2006, LPCH Hospital Board
 September 2006, SHC Medical Board
 August 2006, LPCH Medical Board
 August 2006, LPCH Hospital Board
 September 2006, SHC Medical Board
 September 2006, SHC Hospital Board
 October 2009, Compliance Department/Privacy Office
 March 2010, Compliance Department/Privacy Office
- G. Approvals
 July 2006, Visitor-Observation Committee
 August 2006, LPCH Medical Board
 August 2006, LPCH Hospital Board
 September 2006, SHC Medical Board
 August 2006, LPCH Medical Board
 August 2006, LPCH Hospital Board
 September 2006, SHC Medical Board
 September 2006, SHC Hospital Board
 March 2010, Compliance Department/Privacy Office