



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: Security Contractors

From: Broward Health Contract Administration & Department of Learning

Date: June 2017

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 (security contractor's) compliance. These programs are web based and interactive which link to an exam and subsequent certificate of completion.

All internet based educational programs do have a certificate of completion which is free to the individual. Below, please reference the Security check list and Education requirements (**Attachments A & B**). This is in addition to the contractor requirements which are identified in the Security endor 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 Corporate954-888-3515

Thank you for your cooperation.

ATTACHMENT A



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, 12/2016
APPROVED:	<hr/> 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).



AGENCY/CONTRACTOR HR & ORIENTATION REQUIREMENTS

ATTACHMENT B

Figure 1: Access the Website

1. Go to: www.browardhealth.org/orientation

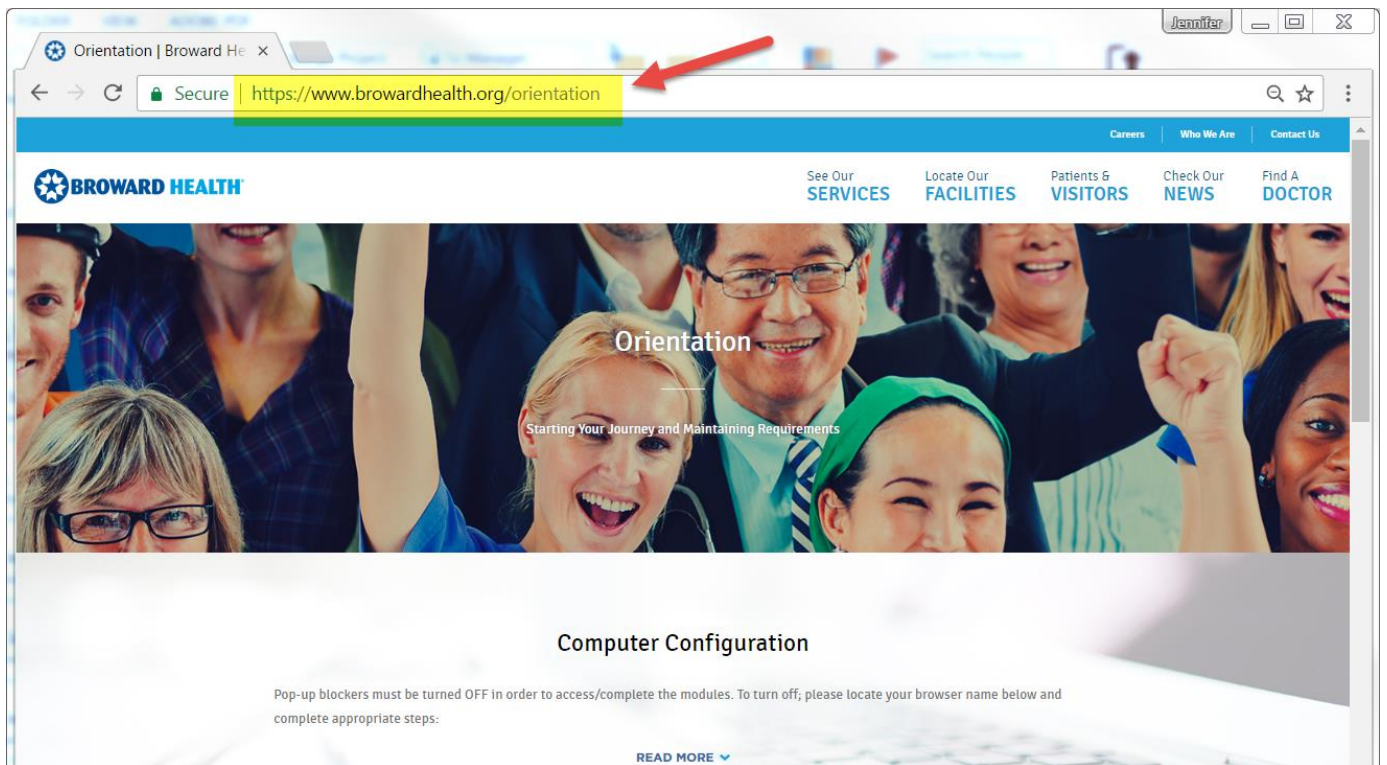
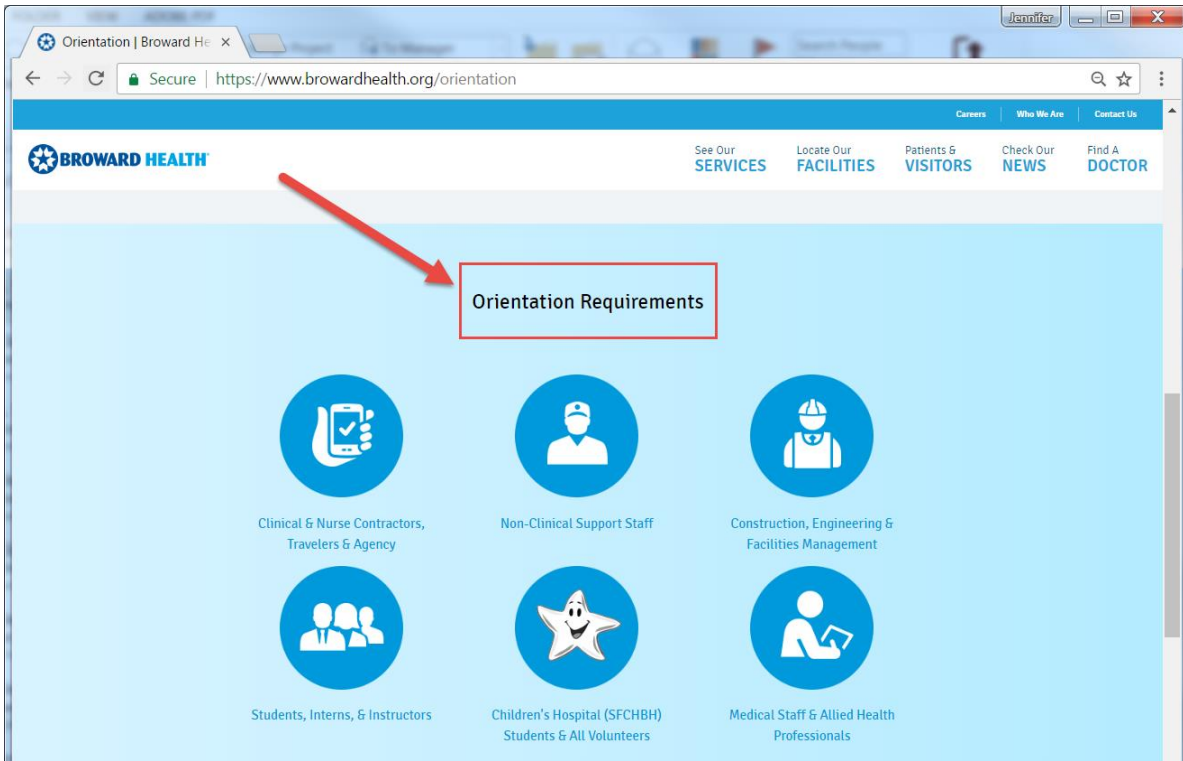


Figure 2: Find your Requirements

1. Be sure to review the Computer Configurations prior to starting your orientation requirements
2. Scroll down to "Orientation Requirements" and select the appropriate group to access your required courses.



SELECT "Construction, Engineering, Facilities Mgt" ICON



SECURITY & ORIENTATION REQUIREMENTS

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 				
<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"> • Contracting Company Verification of negative ten (10) panel Drug Testing (in accordance with Drug Free Workplace Standards) 				
<ul style="list-style-type: none"> • Signed Acknowledgement of Job Description 				N/A for contracted vendors
<ul style="list-style-type: none"> • Verification of Initial Health screening (free of any communicable diseases) 				
<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. 				
ORIENTATION REQUIREMENTS				
<ul style="list-style-type: none"> • BH Orientation Module • BH Risk Management • General Compliance Training • CIA Compliance Training • Code of Conduct Training • Compliance & Ethics Policies and Procedures • Forensic Staff HR Guidelines for Regulatory Compliance – Attestation • Broward Health Appearance Standards - Acknowledgement • Signed Data Security Acknowledgement 				
<ul style="list-style-type: none"> • Initial Shift Assessment of Competency/ Evaluation 				

SECURITY & ORIENTATION REQUIREMENTS 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 • Broward Health Risk Mgt Module • General Compliance Training • CIA Compliance Training • Code of Conduct Training • Compliance & Ethics Policies and Procedures • Forensic Staff HR Guidelines for Regulatory Compliance - Attestation 				
<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) 				

