

## University of Colorado Hospital Policy and Procedure Visitor Policy

### **Related Policies and Procedures:**

Patients'/Parents Rights and Responsibilities  
Visitors to the Operating Room  
Student Affiliation Policy  
News Media Policy  
Pharmaceutical Company Representatives Guideline

**Approved by:** Administration Subcommittee  
Training Council  
Risk Management  
Legal Office  
Privacy Officer  
Information Management Subcommittee  
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**Description:** The purpose of this policy is to define the procedure for obtaining permission to visit and/or observe clinical and non-clinical functions, products or technology, business processes or workflow, obtaining permission to participate in public tours at University of Colorado Hospital (UCH) facilities, and to define the constraints under which vendors and visitors must function.

**Policy:** UCH will attempt to accommodate reasonable requests by vendors and visitors. Reasonable precautions will be taken at the time of the observation to minimize the release of protected health information. Authorizations must be obtained from patients or their legal representatives if they will be observed or if individually identifiable protected health information will be viewed. Vendors and visitors who fail to maintain the confidentiality of information learned during the course of the observation may be denied access to UCH facilities in the future.

**Accountability:** All Hospital CARE Team members, students, faculty, and visitors are accountable for abiding by this policy.

### **Definitions:**

Observer: Individuals in a UCH facility for a period of time for the purpose of watching the performance of clinical and non-clinical duties, systems or processes.

Student: Individuals enrolled in a UCH or University of Colorado at Denver and Health Sciences Center (UCDHSC) educational program, or participating from another institutional entity and participating in a clinical practicum through a formal affiliation contract. Students who come to UCH as a part of a formal affiliation contract are under the auspices of the Student

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Affiliation policy, rather than the Visitor Policy. Students not under an affiliation contract are considered visitors and are therefore are part of this Visitor Policy.

Visitor: Persons present for the purpose of general observation or facility tours; external vendors having a contractual relationship with the Hospital. For the purposes of this policy, "visitor" does not include family, friends, or acquaintances of patients.

Vendor: Representatives of medical device, computer system, supply or pharmaceutical companies. Refer to the Pharmaceutical Company Representatives Guideline for further information on pharmaceutical representatives.

### **Policies/Procedures:**

- A. Prior approval of the department manager or director is required to visit, observe, or tour any department. A formal request must be made and approved no less than 24 business hours prior to the visitation period. The manager or director is responsible for informing CARE Team members of the planned visit and obtaining approval from UCH personnel, as needed.
- B. Visitors/vendors must be in good health and free from obvious contagious conditions which may risk patient safety (such as common cold, upper respiratory illnesses, fever) on the day of their visit.
- C. All visitors/vendors are to wear an identification badge at all times while in the hospital. An affiliate, company, or student badge is acceptable. If the visitor does not have a formal badge from his or her sponsoring organization, the hosting department will issue a temporary name badge containing the following information:
  - Name of visitor
  - Name of company or student program with which the visitor is associated
  - Sponsoring department name
  - Start and end date of the visit
- D. All visitors will be assigned to a specific UCH CARE Team member to accompany them during the designated time period of the visit. This CARE Team member is responsible for taking all possible steps to ensure patient and visitor safety, patient confidentiality, and the protection of UCH proprietary information.
  1. The CARE Team member accompanying the visitors is responsible for ensuring that confidential patient information is not discussed or viewed inappropriately.
  2. If a patient or protected health information will be accessed, the CARE Team member accompanying the visitors is responsible for obtaining a signed "Visitor Confidentiality Agreement (MRD 90342 DOD) from the visitor which will be sent to the Privacy Officer and maintained for a period of 6 years from the date when it was last in effect and an "Authorization to Use or Release Patient Information to Visitors (MRD 90343 DOD) from the patient or patient's guardian or representative prior to the access occurring.
    - a. Authorizations should have the patient's name and medical record number on them and should be placed in the patient's medical record or sent to Health Information Management to be filed.
    - b. Visitors can not have access to patient's or their protected health information without a signed authorization.

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- E. Visitors assessing clinical career options through direct observation should contact the Human Resources Department for assistance and direction. This office will coordinate clinical visits and arrange with departments for visits or to have CARE Team members shadowed and/or interviewed.
1. Human Resources will provide basic HIPAA training for these visitors and obtain a signed confidentiality agreement prior to the observation.
  2. Human Resources will inform the departments of the need to have signed authorizations signed by each patient prior to the visitor accessing protected health information as noted in D.b. above.
  3. Human Resources will maintain documentation of the training and copies of signed confidentiality agreements obtained for a period of 6 years from the last date the observation occurred.
- F. Students participating in a formal, contractual clinical experience at UCH will follow the procedure outlined in the Student Affiliation Policy. All other students who wish to have a short observation experience are considered visitors and must abide by this policy.
- G. The visitor may observe or interact with the patient but may not participate in any hands on care during the observation period. The visitor must be in the presence of a UCH CARE Team member or faculty at all times.
- H. All visitors that will be on campus for more than one day are required to take the on-line orientation provided by Professional Resources.
- I. All patient and UCH proprietary information is to be kept strictly confidential.
1. The visitor will review the policy on patient rights and discuss it with their guide or mentor prior to moving into a patient care area. The following issues are of particular importance:
    - Patient authorization must be obtained when people other than those involved in the patient's care are present during examination or treatment. The authorization must be obtained prior to the visitor entering the patient's room.
    - Patient authorization must be obtained when discussion or consultation involving his/her care will be conducted in the presence of individuals not directly involved in the patient's care.
    - The patient may refuse to be seen, have his or her protected health information revealed, or talk with or see individuals not officially connected with the hospital.
    - The patient must provide written authorization for his/her medical record to be read by individuals not directly involved in treatment or performance/quality improvement activities.
  2. The CARE Team member accompanying the visitor will assist the visitor in determining proprietary information if questions arise.
- J. General group tours of UCH may be arranged through the Office of Public Relations. Tours through specific departments may be requested directly with the department and approved by the department manager or director. Tours are to be conducted by a UCH CARE Team member who provides advance notification to the specific areas to be toured. UCH CARE Team member(s) must accompany all tour participants at all times throughout the tour.
- K. Vendor representatives are to schedule appointments with the department manager or director or his or her designee prior to visiting a department.

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- Vendors are expected to meet with CARE Team members in non clinical locations only. Protected health information on UCH patients should not be accessible.
  - The representative must wear an identification badge at all times while in UCH facilities that clearly shows their name and affiliation.
  - A UCH CARE Team member or faculty member must accompany the representative while in a department.
  - Vendor representatives are allowed to be present during surgical procedures only under the circumstances outlined in "Visitors to the Operating Room" Guideline. Vendor representatives may not participate directly in a medical procedure.
- L. Vendors requesting site visits for potential clients to observe technology or workflow processes must schedule appointments with the department manager or director at least two weeks in advance of the visit.
- A UCH CARE Team member must be present at all times.
  - A simulated or test data/environment or test patient will be used whenever possible.
  - The department manager or director will inform the vendor that he or she is responsible for maintaining the confidentiality of patient information and that failure to do so may result in the refusal to allow future site visits.
- M. Any news media requests to talk with or photograph (still or film) a patient must be cleared with the patient and his or her physician in advance. This will be coordinated by the Office of Marketing and Public Relations. Refer to Policy, "Release of Patient Information to the News Media".
- N. No protected health information may be removed from UCH facilities by the visitors/observers.
- O. All questions regarding the appropriateness of any observation will be referred to the Privacy Officer or Legal Office prior to scheduling the visit.

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