

Name: Observer Policy

Last Review Date: 06/14/2016

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Description: Observer Policy Observation Visit Compliance PHI

Policy Number: FH-ADM.050

Origination Date: 07/25/2013

Purpose: The Observer Policy defines what an observer is and outlines the process in which an individual may have the opportunity to observe the care, treatment and services provided at a Froedtert Health Affiliate.

Definitions: A. Observer: An individual who will be allowed to observe patient care and administrative activities at Froedtert Health facilities. There are two types of observers:

1. Clinical Observer: Any observer who will be watching patient care activities (patient present) or will be in a sterile field/environment.

2. Non-clinical observer: Any observer who has minimal/time-limited business in patient care areas or administrative offices with no contact with patients.

B. Mentor: An individual who is responsible for the observer. The mentor has agreed to allow the observer to watch a particular activity or procedure, to accompany them on rounds or observe clinical practice, or observe other hospital staff carrying out their business duties. The mentor must be an employee of Froedtert Health or the Medical College of Wisconsin or a provider/physician with current medical staff privileges.

C. Vendor Representative: An individual or company who currently supplies or has the potential to supply products or services to a Froedtert Health affiliate.

D. Froedtert Health Affiliate: Froedtert Health affiliate means for purposes of this policy: Froedtert Memorial Lutheran Hospital, Inc.; Community Memorial Hospital of Menomonee Falls, Inc.; St. Joseph's Community Hospital of West Bend, Inc.; Froedtert & The Medical College of Wisconsin Community Physicians, Inc., West Bend Surgery Center, LLC, and Froedtert Surgery Center, LLC. Any other entity that becomes controlled by FH after adoption of this policy also may be considered an affiliate. Also referred to as the System.

Policy: A. General

1. Froedtert Health Affiliates will allow for observers if they meet all eligibility and health requirements.

2. An observer, under this policy, does not include a vendor representative, a student who is part of a school affiliation experience or Workforce Development program (such as the CMH Healthcare Career Academy) Observer.

3. Individuals that are in one of our facilities only to review medical records are not considered Observers.

4. Individuals on a pre-arranged visit that are only touring any of the FH Affiliate organizations are not considered Observers, unless they are touring a service area in a sterile field/environment. The individual must however

verbally agree to the following:

a. verbally agrees that any information or knowledge acquired or received during the course of the observation, including but not limited to patient care information and information contained in patient care records, shall be treated as confidential and shall not, unless required by law or otherwise specifically permitted by the Froedtert Health Affiliate, be disclosed or used during or after the visit at the Froedtert Health Affiliate without the prior written consent of the Froedtert Health Affiliate.

b. must be free of known diseases that are communicable by air or contact when in Froedtert Health facilities.

5. Eligibility: observers must be 16 years old to participate in an observer experience. A parent/guardian signature is required for observers under 18 years of age. The Froedtert Hospital Operating Room does not allow observers under the age of 18 years old.

## B. Observer Responsibilities

### 1. The observer:

a. may not have any physical contact with a patient, conduct a physical exam, take a history or handle patient equipment.

b. is not to consult, make recommendations or decisions regarding patient care.

c. is not to document in the hospital medical record or research record.

d. may not remove, copy or take information with patient identifiers from the facility (including notes that include patient name, MRN, DOS, etc.).

e. verbally agrees that any information or knowledge acquired or received during the course of the observation, including but not limited to patient care information and information contained in patient care records, shall be treated as confidential and shall not, unless required by law or otherwise specifically permitted by the Froedtert Health Affiliate, be disclosed or used during or after the Observer's observation at the Froedtert Health Affiliate without the prior written consent of the Froedtert Health Affiliate.

f. must be free of known diseases that are communicable by air or contact when in Froedtert Health facilities.

## C. Mentor Responsibilities

### 1. The mentor will:

a. make certain that there is no physical contact between the patient and the observer.

b. educate all observers that they should not visit the hospital if they are ill or have a known disease that is communicable by air or contact (i.e., upper respiratory, gastrointestinal illness, etc.).

c. sign and send the observer form to the appropriate designee, when applicable.

d. Inform the observer that any information or knowledge acquired or received during the course of the observation, including but not limited to patient care information and information contained in patient care records, shall be treated as confidential and shall not, unless required by law or otherwise specifically permitted by the Froedtert Health Affiliate, be disclosed or used during or after the Observer's observation at the Froedtert Health Affiliate without the prior written consent of the Froedtert Health Affiliate.

e. Inform each patient or the legally authorized representative of the patient that the clinical observer is not a part of the regular healthcare team and is purely here as an observer.

f. Accompany the observer at all times.

#### D. Required Documentation and Health Requirements

1. All observers (clinical and non-clinical) must sign a Froedtert Health Observer Form and the Observer/Mentor Agreement. (Appendix A) .

2. All observers less than 18 years of age must have a parent/guardian sign the Observer Form and Observer Agreement Consent.

3. All clinical observers must document the date of a negative TB skin test, negative Quantiferon Gold blood test or negative chest x-ray.(obtained within 12 months prior to the observation).  
All clinical observers will document the date of MMR vaccine or positive Rubella titer.

#### E. Documentation Retention:

1. Froedtert Hospital requires the sponsoring department to keep the Observer Form and Observer/Mentor agreement (Appendix A).

2. Community Memorial Hospital and St. Joseph's Hospital Organizational Development or Education Services Departments will retain documentation.

3. FH Community Clinics the Infection Prevention and Safety Coordinator will retain documentation.

4. All documents are to be made available to the Froedtert Health Compliance Office, upon request.

5. Observer Agreements should be retained for a period of six years.

#### F. Observer Process Flow –The workflow differs between entities.

1. At Froedtert Hospital Educational Services, Department Educators and Leaders play a role in the observer requests, scheduling and documentation process (See Appendix B) and;

2. at the FH Community Clinics the Safety and Infection Control Officer takes the lead and;

3. at CMH and SJH, the Organizational Development or Education Services Departments will intake, coordinate and retain all documentation.

4. Please contact the appropriate party at each site.

Related Policies: [Sales Visits to Froedtert Health Facilities](#)

Issuing Authority: FH Corporate Policy Committee

Distribution: Froedtert Health

Reference Type:

Additional Attachments: [FH-ADM.050 Attachment A.pdf](#)

Additional Attachments 2: [FH-ADM.050 Attachment B.pdf](#)

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