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MICHIGAN MEDICINE
UNIVERSITY OF MICHIGAN

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Owner:	<i>Rebecca Hulea: Compliance Director</i>
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References:	<i>MM/UMHS Policy, Policy</i>
Applicability:	<i>Michigan Medicine Admin and Clinical</i>

Michigan Medicine Visiting Observer: Individual Who May Observe But Not Provide Patient Care Policy, 04-06-061

I. POLICY STATEMENT, PURPOSE AND SCOPE

The purpose of this policy is to (1) define the circumstances in which observation of patient care are appropriate, (2) ensure that all observational experiences are conducted with the rights, dignity and best interests of patients in mind, (3) ensure compliance with the Health Insurance Portability and Accountability Act (HIPAA) and standards for privacy of protected health information (PHI), (4) establish standard requirements for those who wish to observe patient care activities within Michigan Medicine.

1. The policy will be applied uniformly and consistently to all requests to observe patient care activities within Michigan Medicine.
2. This policy does not apply to visits by vendors or vendor representatives that are subject to [UMHS Vendor Visitation and Interaction Policy, 01-04-008](#).
3. This policy does not apply to patient/family visitors who are subject to [UMHS Visitation and Family Presence Policy, 03-07-021](#).
4. This policy does not apply to students, non-physician visiting health professionals and others who, for the purpose of furthering their education or providing education in their area of expertise, participate in clinical care and are subject to [UMHS Students, \(Non-Physician\) Visiting Health Professionals, and Others Who Participate in Clinical Care, 04-06-062](#).
5. This policy does not apply to physicians who participate in patient care for the purpose of education, either with special expertise to demonstrate or assist specific procedures to Michigan Medicine physicians, or those wishing to learn specific procedures from Michigan Medicine physicians, that require privileges and are subject to [Michigan Medicine Visiting Clinical Scholars, 04-06-060](#).
6. Clinical Program Trainees (CPTs) are not eligible for observer status, therefore, are not covered under this policy. The hosting department should contact the Graduate Medical Education Office for guidelines related to clinical rotations and the associated application process under [UMHS Special Purpose Trainee Appointment Policy, 04-06-055](#).
7. This policy does not apply to volunteers which are subject to [UMHS Volunteer Service Policy, 01-05-001](#).

Lastly, this policy does not apply to prospective hires that are touring the clinical areas but not observing individual patient care activities or protected health information.

II. DEFINITIONS

Observer - Visiting health professionals, students, or others who may observe patient care activities and protected health information (PHI), and are NOT permitted to be involved, assist with, or participate in any patient care activities. These individuals are not fulfilling clinical rotation requirements. It includes health professionals who are invited by a clinical department for educational purposes (e.g., to deliver a lecture), but who also observe patient care, such as inpatient teaching rounds, without provision of patient care.

III. POLICY STANDARDS, PROCEDURES/ ACTIONS

A. Age Restrictions

1. Individuals who wish to observe patient care activities must be at least 18 years of age unless participating in a formal program affiliated with Michigan Medicine. These restrictions include any direct interactions with patients and/or identifiable medical records where protected health information (PHI) may be seen by the observer.
2. No participant under the age of 18 will be allowed to observe patients under the influence of anesthesia or who are sedated for medical procedures, or who are otherwise unable to give verbal permission for the observation.
3. No participant under the age of 18 will be allowed to observe procedures or examinations where patients are disrobed, or observe sensitive examinations such as breast and pelvic examinations or autopsies.
4. Age restrictions do not exist for participation in tours, but organizers are expected to exercise prudent judgment with respect to inclusion of young participants.

B. Pre-Visit Approvals

1. An observer may visit upon written (paper or electronic) approval of the hosting department of Chief of Staff (or designee).
2. Medical students applying or being recruited for a University of Michigan Medical School House Officer position, and those from other than the University of Michigan Medical School, may visit Michigan Medicine only after receiving Medical School approval through the Office of Student Programs. The Office of Student Programs is responsible for any credentialing activities and placements according to the student's level of training and the availability of services and rotations. There are no exceptions to this process.
3. All other visiting observers are to be handled per guidelines of the sponsoring department. These must be in compliance with the general requirements outlined in part C below.
4. Programs or events involving individuals under the age of 18 are to be registered with the Children on Campus Program at least 60-days in advance of the program or event start date. Organizers of the program / event are to work with Children on Campus program administrators per [SPG 601.34](#).

C. General Requirements

1. [Visiting Observer Request Form \(Exhibit B\)](#) must be completed. This form is to be kept at the department level. Approval for the Visiting Observer may not exceed one year.
2. HIPAA Compliance

- a. If the length of the visit is to be two days or less, the "[HIPAA Privacy Regulations in a Nutshell \(Exhibit A\)](#)" may be used. This form must be kept at the department level.
- b. If the visit will be for more than two days, the Visiting Observer must complete the on-line [HIPAA Training](#) and print the certificate of completion for the department. The verification is retained at the department level.
3. The Visiting Observer must report to the Key and ID Office at the beginning of the initial day of his/her visit to receive a Visiting Observer Badge. The badge must be worn at all times and will show the inclusive dates of his/her visit and alert patients and staff that the individual has no clinical privileges.
4. On completion of the visit, the visitor must return the Visiting Observer Badge to the sponsoring department.
5. The Visiting Observer must sign a [Code of Conduct Attestation \(Exhibit C\)](#) and otherwise comply with University of Michigan policies. The name of the visitor must be printed or typed, in addition to the signature. This is retained at the department level.
6. The Visiting Observer must be supervised by a sponsoring University of Michigan employee during any patient interactions or discussions about patient care.
7. The patient must be informed and give verbal consent before permitting the Visiting Observer to interact with any patient.
8. Specialty Area Observation: Written and dated confirmation of approval from a designated representative from the unit will be obtained prior to the anticipated visit (e.g., Operating Room, Medical Procedures Unit).
9. All visiting observers must provide proof of immunity to measles, mumps, rubella, varicella, pertussis, and influenza in compliance with [Michigan Medicine Infection Control Practices Policy, 04-06-002](#). Proof of a tuberculosis test (PPD or IGRA) within the past year is also required. The [UMHS Immunization /PPD documentation form \(Exhibit D\)](#) with proof of immunization must be completed and kept by the University of Michigan school/department that has responsibility for awarding credit to the student, or kept in the UMHS department/area. All records must be available upon request. [Required immunizations can be found here.](#)

IV. EXHIBITS

[Exhibit A: HIPAA Privacy Regulations in a Nutshell](#)

[Exhibit B: Visiting Observer Request Form](#)

[Exhibit C: Code of Conduct Attestation](#)

[Exhibit D: UMHS/UMHHC Immunization/PPD Form - Updated July 2017](#)

V. REFERENCES

[UMHS Vendor Visitation and Interaction Policy, 01-04-008](#)

Author: Office of Clinical Affairs; Compliance Office

Approved by:

Executive Committee on Clinical Affairs - July 27, 2004; December 13, 2005

Director and Chief Executive Officer, UMHHC - August 27, 2004; December 22, 2005

Reviewed by Office of Clinical Affairs with no changes required - February 23, 2010

Reviewed by Office of Clinical Affairs with no changes required - June 20, 2014

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Non-substantive revisions made by the Office of Clinical Affairs (Marc Moote) - September 2016

September 2016 revisions approved by ECCA - September 16, 2017.

Reviewed by Office of Clinical Affairs - April 2020 (changes accepted to align policy with SPG 601.34)

Attachments

[04-06-061 Exhibit B.doc](#)

C: Code of Conduct Attestation

B: Visiting Observer Request Form

A: The HIPAA Privacy and Security Regulations in a Nutshell

D: UMHS/UMHHC Immunization/PPD Form

Approval Signatures

Step Description	Approver	Date
Executive Approval - UMHS President	David Spahlinger: Executive Vice Dean for Clinical Affairs [CJ]	05/2020
Reviewed and approved at ECCA	Adnan Ahmad: Staff Specialist Hlth	05/2020
Reviewed by Policy Owner/ Workgroup/Sub-Committee	Rebecca Hulea: Compliance Director	05/2020

Applicability

Michigan Medicine Administration, UMHS Clinical