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Owner	Linda Bowles: Dir Volunteer Services
Policy Area	Administrative
Applicability	UNC Medical Center

Shadow Students or Visitors

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I. Description

Requirements for bringing shadow students or visitors to UNCH.

II. Rationale

It is part of the mission of the University of North Carolina Health ("UNCH") to provide educational opportunities to the community and to members of the health care profession. The purpose of this policy is to address the privacy and security requirements for "shadow" students/visitors and other special visitors (collectively referred to herein as "shadow visitors"), and to enable UNCH to ensure patient confidentiality rights are respected, patient safety is optimized, and UNCH policies and procedures are followed.

A. A shadow visitor is a person who is not part of a formal clinical training program, but is interested in observing the hospital environment for a continuous period of 8 days or less during the calendar year. Individuals who will observe for a period greater than **8 days** during the calendar year must: i) be part of a formal clinical training program; ii) arrange with the sponsoring department to execute a Student Affiliation Agreement (which can be obtained through the sponsoring department); and iii) complete the requisite Student Affiliation Agreement requirements, including immunizations and criminal background checks. Individuals may shadow a maximum of **8 days during a calendar year**. Authorization to shadow is given on a **daily** basis, no matter the number of days the shadow visitor will be present in any given week. Although individuals may shadow **in** more than one department, the total amount of time that an individual may shadow in a single calendar year is **8 days.** For example, in a calendar year, an individual may ***not*** shadow for **8 days** for one department and then an additional **8 days** for another department.

B. Shadow visitors include, but are not limited to, college students and other community and professional observers, but do not include students participating in a contracted program of

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study with UNCH. Shadow visitors must be at least eighteen years old. If a shadow observer is at least sixteen years old and is participating in a program organized or sponsored by a unit of UNCH that involves shadowing, the shadow visitor may be allowed to shadow with prior approval from Volunteer Services and the units to be visited. Special approval may be granted for student groups associated with local schools.

C. Shadow visitors may not perform functions that are otherwise performed by employees or registered volunteers, or engage in patient care in any way. Shadow visitors may only observe.

D. Each shadow visitor must have a sponsoring UNCH department and individual escort. The UNC Hospitals Volunteer Services Department ("Volunteer Services") is not responsible for obtaining a sponsoring department or an escort for shadow visitors.

III. Procedure

- Shadow visitor experiences are coordinated through the sponsoring department and Volunteer Services. The following requirements apply to shadow visitors:

    1. All shadow visitors must register with Volunteer Services.
    2. Each shadow visitor who falls into categories 5b, 5c, and 5d below will be required to take the brief online tutorial in privacy requirements ("HIPAA Training"), which is located on the Volunteer Services website. The sponsoring department is responsible for ensuring the HIPAA Training is completed prior to starting the shadow experience.
    3. Each shadow visitor who falls into categories 5b, and 5d below will be required to provide proof that the shadow visitor is current on the immunizations as set forth in the form attached as **Attachment 1**, "Immunization Review Form for Shadow Visitors." Shadow visitors are responsible for obtaining these immunizations at their own cost.

        Shadow visitors should submit the completed form to Volunteer Services, which will review the form. If there are any questions regarding whether the shadow visitor has provided the requisite proof of the required immunizations, Volunteer Services should consult with Occupational Health Services. Shadow visitors will not be able to begin the shadowing experience without providing proof of the required immunizations. No immunization exemptions of any type are allowed for shadow visitors.
    4. Each shadow visitor must obtain and wear a badge identifying them as a shadow visitor. Badges are provided by Volunteer Services. **Badge requests must be made by the sponsoring department to Volunteer Services at least 1 week in advance of the shadow visitor's arrival**. Shadow visitors will not be able to begin the shadowing experience without a badge. The shadow visitor must obtain the badge from Volunteer Services. In order to obtain the badge, the shadow visitor must show photo identification, and, if required, provide proof of completion of the HIPAA Training and the completed Immunization Review Form for Shadow Visitors.
    5. There are several categories of shadow visitors. Placement in one of these categories will determine the requirements for such individuals or groups:

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a. Shadow Visitors Touring in Primarily Non-patient Care Areas

- Individuals or groups who come to UNCH for a staff-accompanied tour in primarily non-patient care areas (such as Carolina Air Care helicopter pad, Lobby and other public areas, etc.) will not be required to complete any formalized training, but such individuals or groups will be registered with Volunteer Services. As appropriate, the tour guide will remind touring visitors to retain any Protected Health Information (PHI) in confidence.

b. Shadow Visitors Observing in Patient Care Areas or Areas Containing Patient Information

- Individuals or groups who come to UNCH to observe in patient care areas or areas (or systems) that contain patient information, but who will not observe specific procedures, will be required to be registered with the sponsoring department and Volunteer Services as set forth above. ***Admission to procedure rooms depends on the applicable departmental policies and procedures*. Shadowing in the operating rooms requires additional compliance** ***(see Patient Care Observers in the Operating Room)*.** These individuals or groups must complete the HIPAA Training, provide proof of the required immunizations, and will be required to follow applicable departmental policies and procedures. When possible, the patient and/or family members will be asked for permission by the observer's sponsor to bring shadow visitors into the patient care area.

c. Prospective Employees who have been given an offer of employment.

- Individuals who have interviewed and are being considered for an offer of employment and request to shadow in that specific department, for one time up to 8 hours, will be required to be registered with the sponsoring department and Volunteer Services as set forth above. The offering department will notify Volunteer Services and ensure the prospective employee completes the HIPAA training prior to starting the shadow experience and follows the necessary safety policies and procedures.

d. Shadow Visitors Observing Specific Procedures

- Individuals or groups who come to UNCH to observe specific procedures in patient care areas will be required to be registered with the sponsoring department and Volunteer Services as set forth above. ***Admission to procedure rooms depends on the applicable departmental policies and procedures. Shadowing in the operating rooms requires additional compliance (see Patient Care Observers in the Operating Room).*** These individuals or

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groups must complete the Observer Tutorial, provide proof of the required immunizations, and will be required to follow applicable departmental policies and procedures. In addition, the patient whose specific procedure will be observed must sign an Authorization Form allowing the observation.

e. Special Events

- If the participants for a special event, such as a phone-a-thon, seminar or other specific volunteer event, will not be specifically observing patient care, they will not be required to complete any formalized training, but such individuals or groups will be registered with the Volunteer Services Department. For all other groups, Volunteer Services will determine, in consultation with other departments (such as Occupational Health Services or the Legal Department), whether or not the HIPAA Training or proof of immunizations is required.

Anyone with questions or reports of violations of these procedures should contact the Volunteer Services Department at 984-974-4793 or volsvcs@unchealth.unc.edu.

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Attachments

9-21-22 Patient Care Observers in the Operating Room.pdf

Attachment 1: Immunization Review Form for Shadow Visitors

Approval Signatures

Step Description	Approver	Date
Policy Stat Administrator	Kimberly Novak-Jones: Nurse Educator	10/2022
Sys VP Deputy General Counsel	Jennifer Markham: Sys VP Deputy General Counsel	10/2022
HCS Attorney Sr	Amanu Nwaomah: HCS Attorney Sr	10/2022
Executive Director Privacy	David Behinfar: HCS Exec Dir Privacy	10/2022
	Linda Bowles: Dir Volunteer Services	10/2022

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