

<b>Policy Title:</b> Student Unpaid Field Experience and Training	<b>Policy Number:</b> SC.QRM.PCS.026
<b>Regional Business Owner Title:</b> Regional Chief Nurse Executive and Vice President Patient Care Services	
<b>Regional Custodian Title:</b> Director, Regional Professional Development and Education	<b>Original Effective Date:</b> 05/11/2018
<b>Medical Center Business Owner Title:</b> MSAAT/MCAT	
<b>Medical Center Custodian Title:</b> Chief Nurse Executives; Director of Professional Development and Education, Education Lead	<b>Revision Effective Date:</b> 02/23/2021
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## 1.0 Policy Statement

Kaiser Permanente (KP) Southern California (SCAL) supports the education of students for the attainment of an academic degree or certification through the provision of opportunities for highly relevant un-paid clinical experiences/rotations with an emphasis on the delivery of quality and safe care.

This policy was developed to provide structure and guidelines for KP SCAL when contracting with affiliated colleges/universities/schools for unpaid field experience and training programs for students across the Region.

## 2.0 Purpose

The purpose of this policy is to establish the criteria and requirements necessary to ensure the safety of our patients, employees, and Program Participants when establishing student unpaid field experience and training within a KP SCAL facility.

## 3.0 Scope/Coverage

**3.1** This policy applies to all Program Participants who are participating in unpaid field experience and training in any of the following entities:

**3.1.1** Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals (together, KFHP/H);

**3.1.2** KFHP/H's subsidiaries;

**3.1.3** Southern California Permanente Medical Group (SCPMG)

## 4.0 Definitions

**4.1 Being Under the Influence** refers to any individual impaired by alcohol or a drug or the combination of alcohol and drugs, regardless of the level detected. A determination of under the influence can be established by a professional opinion, medically accepted drug or alcohol screening test, and/or based on lay observations by supervisors, colleagues, or others.

**4.2 Facility** refers to all KP SCAL Medical Centers and medical office buildings. It also refers to Home Health, including but not limited to, a home health facility, nursing home, hospice, palliative, subacute facility, patient's residence, or KP affiliated facilities where Program Participants are under the supervision of an employee at Kaiser Entities.

**4.3 Faculty** refers to the School's unpaid field experience and training instructors, who have completed KP onboarding requirements.

**4.4 Kaiser Permanente Entities (KP Entities, Kaiser, or KP),** refers to any Medical Program entity of KPSC contracting with Schools for an unpaid field experience and training program, including KFHP, KFH, or SCPMG.

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- 4.5 KP Academic Liaison and/or designee** refers to the KP personnel coordinating Program Participants.
- 4.6 Network Development and Administration (ND&A)** refers to the Southern California (SCAL) Regional Department that drafts, negotiates, and executes all SCAL school agreement for unpaid field experience and training.
- 4.7 Program Participant** refers to any Student(s) or Faculty participating and/or covered under KPSC School Agreements for Student Unpaid Field Experience and Training.
- 4.8 School** refers to an educational institution that has a School Affiliation Agreement with KP.
- 4.9 Student** refers to any person enrolled in a School's healthcare-related program who is or will be participating in their specified unpaid field experience and training hours with KP. Students must have completed KP onboarding requirements prior to the start of their unpaid field experience and training.
- 4.10 Unpaid** refers to students who are not paid via W2 by KP payroll. Some W9 and stipend payments do fall under these agreements. They are approved and reviewed on a case by case basis by the School Agreements Stakeholder Group (SASG) and KP Legal.
- 4.11 KP Sponsor** refers to any KP leader willing and able to vouch for a prospective school program.

## **5.0 Provisions/Procedures**

### **5.1 Affiliation Contracts/Scheduling**

- 5.1.1** A current School Affiliation Agreement between KP SCAL and School, including the specific program of study, must be in place prior to the establishment/implementation of any Program Participant's unpaid field experience and training rotation/placement with KP.
- 5.1.2** To add a program to a current School Agreement Contract or to request a new school contract, contact the Medical Center's Academic Liaison, designee, and/or KP Sponsor to obtain process instructions and a School Agreement Request Form.
  - 5.1.2.1** The **completed** School Agreement Request Form is to be submitted to [kpscschoolagmtreq@kp.org](mailto:kpscschoolagmtreq@kp.org)
- 5.1.3** Request for a new program or new school affiliation must meet the following criteria for consideration:
  - 5.1.3.1** There must be an identified need by the applicable Medical Center(s), Department Manager, Director of Professional

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Development and Education (PD&E), or Education Lead for the program.

**5.1.3.2** Approving Director of PD&E, Education Lead, Academic Liaison (AL), or designee is responsible for ensuring School meets KPSC accreditation and curriculum standards and for oversight of unpaid field experience and training.

**5.1.3.3** Once a School Agreement Contract is in place for the program, Schools must submit written request for Program Participant's unpaid field experience and training program placements to KP's Academic Liaison and/or designee.

**5.1.3.4** Unpaid field experience and training program placement is based on space availability and at the discretion of the Department Administrator, Director of PD&E, Education Leads, Academic Liaison, and/or designee.

**5.1.4** KP's Academic Liaison and/or designee will coordinate placement for applicable approved program unpaid field experience and training programs.

**5.1.5** The number of students accepted for all unpaid field experience and training programs will be limited to 10-12 per Faculty or as further limited by the KP Academic Liaison consistent with industry best practices and applicable regulations, if any.

**5.1.6** Program Participant must complete all of the following requirements set forth by this policy in order to participate in the unpaid field experience and training (refer to Appendix A for a complete list).

**5.1.6.1** Program Participants concurrently employed by KP SCAL while completing clinicals, un-paid internships, projects, certifications, or leadership practicums, will be required to complete onboarding requirements, but will not need to provide proof of clearances as set forth by this policy (i.e. criminal record search, drug testing, immunization review- refer to Appendix A).

**5.1.7** KP employees who are also Students may complete their unpaid field experience and training within their assigned work unit/home and require the written approval of their direct supervisor. Such written approval must be provided to their local Medical Center AL/designee.

**5.1.8** KP employees who are Faculty of an affiliated School may be Faculty on the same unit/department where they work with the written approval of their direct supervisor. Such written approval must be provided to their local Medical Center AL/designee.

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**5.1.9** Managers who authorize their employee to complete their unpaid field experience and training (as student or faculty) in the unit/department for which they work are accountable for the following:

- 5.1.9.1** Inform and confirm with local Human Resources (HR) of the intent for an employee to participate as a student/faculty as unpaid field experience personnel and obtain approval where warranted.
- 5.1.9.2** Confirm with managers (i.e. Pharmacists) required access to certain assets (i.e., medication room) based on Medical Center practice, course curriculum, and objectives. Manager to communicate access needs to local AL/designee.
- 5.1.9.3** In collaboration with onsite faculty, monitor student access to pharmaceuticals and protected health information.
- 5.1.9.4** In collaboration with faculty, review KP data or information student(s) intend to use for program submissions and include any pertinent stakeholders to review the data/information prior to any approvals are given.
- 5.1.9.5** Follow procedural steps for any research and/or quality improvement programs students request to perform. Be sure to include pertinent stakeholders in the review of any requests. See Appendix B for request process.
- 5.1.9.6** Issue and retrieve any KP SCAL assets issued as part of the student rotation, when the asset is no longer needed.
- 5.1.9.7** Report suspicions of unethical practice or wrongdoing to the appropriate personnel (i.e., privacy breaches to local Compliance, intoxication to local HR).

**5.1.10** All affiliation agreements with any academic institutions, governmental agencies, placement firms, or individuals for any Program Participant's training program, must be completed and vetted through the KP SCAL Regional School Agreement Stakeholders Group. No unauthorized KP SCAL employees are allowed to sign any agreements or side letters, or to agree to terms or conditions of unpaid field experience and training programs.

**5.1.11** Program Participants who were former KP employees who were terminated and coded as non-rehirable, these Program Participants will be prohibited from participating in unpaid field experience and training at KP.

## **5.2 Unpaid Field Experience and Training Program Coordination and Program Participant Eligibility Requirements:**

**5.2.1** KP SCAL Program Participants at KP facilities must be at least 18 years of age.

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**5.2.2** The Academic Liaison and/or designee must validate the existence of an active and valid School Agreement Contract, between the School and KP prior to and during the time of a Program Participant's placement in the unpaid field experience and training program. The contract must be signed and maintained by the ND&A.

**5.2.3** ND&A maintains insurance status for all affiliated schools and programs.

### **5.3 Onboarding Process — See Appendix A**

### **5.4 Faculty/School Accountabilities**

**5.4.1** The School is responsible for evaluating the Faculty's competence. Faculty must hold a current California professional health care license and a current American Heart Association (AHA) Basic Life Support (BLS) and/ or additional certifications, as appropriate. Documentation must be provided for KP to review upon request.

**5.4.2** If Faculty is absent, a qualified substitute who has read, completed, and submitted all the Faculty and KP requirements, must be on duty to supervise the Students. If this is not possible, the unpaid field experience and training will be cancelled for the day and Students will be directed to leave the KP Facility.

**5.4.3** Prior to any unpaid field experience and training, the Faculty is responsible to define the Student's scope of practice, level of capabilities, and limitations to the clinical staff as outlined in the student syllabus. A copy may be requested by the KP's Academic Liaison and/or designee.

**5.4.4** Faculty ensures the orientation of the Students to the KP Facility as well as to the individual patient care areas. If the Student's unpaid field experience and training does not require the Faculty to be on site, KP may orient Students to the KP Facility and patient care areas.

**5.4.5** Follow medical center specific requirements for dress code and hygienic practices.

**5.4.6** Failure to comply to any provision in this section will result in immediate notification of the Faculty and Academic Liaison and/or designee, and/or designee.

### **5.5 Security & Safety Processes**

**5.5.1** Program Participants are required to wear a KP produced photo identification badge while at a KP Facility. Some Facilities may require the Program Participant to wear both the KP and School photo identification badge.

**5.5.1.1** Exceptions to this section are permissible if KP Medical Center allows the Program Participant to wear only a School photo identification badge.

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**5.5.2** All badges are to be worn on the front upper torso and shall be clearly visible to observers, including patients. Nothing is to be attached to the badge to cover any identifying portions of the badge.

**5.5.3** KP identification badges are the property of KP and are to be returned to the KP Academic Liaison and/or designee on the last day of the unpaid field experience and training.

## **5.6 Medication Administration**

**5.6.1** A Faculty or authorized KP Staff Nurse must co-sign with Students for allowable medications administered to KP patients.

## **5.7 Unusual Occurrences**

**5.7.1** KP will provide necessary emergency health care or first aid to an injured Program Participant or Faculty participating in affiliated Program(s) at the Facilities, consistent with KP Entities policies and procedures pertaining to employees or visitors injured at a KP Facility.

**5.7.2** KP Entities shall have no obligation to furnish medical or surgical care beyond emergency care or first aid to an injured Program Participant, or provide accident, health, or any insurance coverage for the Program Participant.

**5.7.3** If a Program Participant is injured in a KP Facility during their unpaid field experience and training, or during a visit to a non-Kaiser Facility, such as Home Health, the Program Participant will obtain treatment at the nearest KP Facility equipped to provide the necessary emergency care or first aid.

**5.7.4** If the injured Program Participant is not near a KP Facility equipped to provide the necessary emergency care or first aid and is stable for transport, KP personnel will make arrangements to transport the Program Participant to the nearest KP Emergency Department.

**5.7.5** If the injured Program Participant needs immediate emergency care, KP Personnel will call KP's Rapid or Ambulatory Response Team or 911.

**5.7.6** All significant or unusual incidents during the unpaid field experience and training must be reported immediately: Faculty/School, KP Charge Nurse (if applicable), Department Manager, Director PD&E/Education Lead, and Academic Liaison and/or designee.

**5.7.7** KP's Unusual Occurrence Report (UOR) must be completed at the time of the occurrence by the unit/department leader and on the unit of the occurrence. The Director PD&E/ Education Lead should be notified of the incident.

**5.7.8** The Director PD&E/Education Lead shall notify in writing the Medical Center Chief Nurse Executive (CNE), or Department Administrator/Manager, and the Area

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chief Financial Officer (ACFO) of the incident informing them not to bill the Program Participant for the emergency care or first aid provided per KP Policy.

## 6.0 References/Appendices

- 6.1 Appendix A: Onboarding Process
- 6.2 Appendix B: Process MAP for KPSC Employee Nursing Student Project Request
- 6.3 The Joint Commission, HR.01.02.07
- 6.4 Centers for Disease Control and Prevention
- 6.5 Advisory Committee on Immunization Practices
- 6.6 Drug Free Workplace NATL.HR.030
- 6.7 Employment Screening NATL.HR.011
- 6.8 Environmental, Health and Safety NATL.EHS.001
- 6.9 Pre-Employment Drug Test NATL.HR.029
- 6.10 Waiver for Fees for Do Not Bill Events NATL.HQCDE.007
- 6.11 Identification Badges SC.HPH0.96.1
- 6.12 KP HR Policy CA.HR.5.02
- 6.13 Obligations Regarding Confidentiality REGL.HR.001b

## 7.0 Signature Lines

Appropriate Signature(s) on file of the senior regional leader(s) that approved the policy and procedure in accordance with the SCAL regional policy and procedures guidelines.