

HARBOR-UCLA MEDICAL CENTER

**SUBJECT: HEALTH SCREENINGS: NON-COUNTY WORKFORCE MEMBERS**  
**POLICY NO. 205A**

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**PURPOSE:**

To ensure non-County workforce members (WFMs) comply with the various Federal and State laws and regulations, accreditation requirements and County policies governing non-County WFMs' health screenings, and to provide guidance on medical follow-up and surveillance of non-County WFMs.

**SCOPE:**

This policy applies to any and all persons authorized to provide a service or perform duties within any Department of Health Services (DHS) facility/program who are non-County WFMs. This includes, but is not limited to, physicians, nurses, allied health/technical staff, rotating physician postgraduates from formally-affiliated teaching programs/approved rotation, students, administrative support staff, volunteers, trainees, vendors, contract staff, and non-DHS County staff whose conduct of work performance is under the direct control of DHS, whether or not they receive compensation from the County.

**POLICY:**

It is the policy of DHS to provide its workforce with a safe and healthy work environment. All persons who work at a County health facility must have appropriate documentation of health clearance or required health screening.

**Exception:** Non-County WFMs working on health facility grounds but not within the walls of a hospital or health facility and who do not have contact with patients or other WFMs as part of their assignment do not need a health screening. If the non-County WFM's job or assignment requires providing patient care or working in a patient care area, the non-County WFM must adhere to all facility infection control standards which include initial and annual health screenings and immunizations.

Prior to assignment, all non-County WFMs must satisfactorily complete a health screening conducted by a physician or licensed health care professional (PLHCP) prior to assignment to determine if the WFM meets the health screening requirements established for the prospective job assignment and to meet State and Federal health and safety regulations.

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**EFFECTIVE DATE:** 1/11  
**REVISED:** 2/14, 2/17, 11/19  
**REVIEWED:** 2/14, 2/17, 11/19  
**REVIEWED COMMITTEE:** N/A

**SUPERSEDES:**

**APPROVED BY:**

  
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Kim McKenzie, RN, MSN, CPHQ  
Chief Executive Officer

  
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Anish Mahajan, MD  
Chief Medical Officer

  
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Nancy Blake, PhD, RN, NEA-BC, FAAN  
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Non-County WFMs and students must provide Employee Health Services (EHS) with documentation of health screening (e.g., immunization records, TB screening tests) from their PLHCP or school, as applicable.

If the prospective WFM is a minor (person under 18 years of age), consent is required from the minor's parent or legal guardian prior to obtaining medical information or conducting a health screening or services on the minor unless s/he can consent to such services on his/her own behalf or can document s/he is an emancipated minor. The guardian must be present, with a valid identification, to sign the consent form.

Workforce members evidencing symptoms of infectious disease or reasonably suspected of evidencing symptoms of infectious disease may be medically screened prior to providing patient care. Workforce members determined to have infectious potential shall be denied or removed from patient contact and work duties as deemed necessary to protect the safety of patients and WFMs, as appropriate.

**PROCEDURE:****PRE-PLACEMENT/ASSIGNMENT SCREENING:**

Pre-placement health screening and annual health screening/surveillance for non-County workforce members will be provided in accordance with terms of the contract/agreement or Memorandum of Understanding (MOU) and Federal and State laws and regulations. Fees and costs for these EHS services may be billed to the contractor or agency, as appropriate.

The pre-placement/assignment health screening will be conducted by the prospective non-County WFMs PLHCP or designee. The prospective non-County WFM is required to submit "E2 Pre-Placement Tuberculosis History and Evidence of Immunity" upon initial assignment to DHS. Each year, thereafter, while the non-county WFM is on assignment at DHS they must submit the "E2 Annual Health Questionnaire and Screening" Form.

County criteria includes the following forms that are to be completed. The forms are available via the DHS Internet website [www.dhs.lacounty.gov](http://www.dhs.lacounty.gov).

**NOTE:** The forms must be signed by a healthcare provider attesting all information is true and accurate OR WFM may supply all required source documents to DHS EHS to verify.

The contractor/contract agency must attest that EHS staff will be provided with source documents for review within four (4) hours of a request. Source documents pertaining to the pre-employment health screening will be maintained by the contractor/contract agency. Fees and costs for these EHS services may be billed to the contractor or agency, as appropriate.

Facility Liaisons/contract monitors/supervisors/managers (Sponsors) are required to ensure non-County WFMs receive the appropriate forms, submit them to their facility EHS, and have obtained health clearance before a badge is issued and prior to beginning his/her assignment.

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**ANNUAL HEALTH SCREENINGS:**

(All non-County WFMs– No exceptions.)

All non-County WFMs are expected to comply with annual health screenings. Unless provided for per contract/agreement, the non-County WFM shall have their PLHCP conduct the screening in accordance with County policies and procedures. The non-County WFM will be provided with the necessary documentation for completion and submission to a PLHCP. The non-County WFM must submit the completed E2 form to EHS.

Non-County WFMs may receive a reminder to comply with annual health screening requirements. Non-County WFMs who do not comply with annual or other health screening requirements will be given a letter indicating they have until the end of the month to comply. A copy of the e-mail is sent to the WFM sponsor for action. Failure to provide documentation of timely health screening/clearance will result in immediate termination of assignment and placement in a “Do Not Send” status until compliant.

**SPECIAL GROUPS:**

**Health Professions Students** are non-County WFMs who are registered in the County’s sponsored health professional schools.

Newly enrolled students will undergo a health screening for communicable disease after passing their Live Scan. No physical exam is to be conducted. An initial pre-assignment health screening, and annually thereafter, are required and will be provided by the County at no cost. After clearance by EHS, an ID badge is issued by the facility on-site HR.

**Volunteers** are non-County WFMs who are typically processed through the Volunteer Office.

Individuals completing an application for Volunteer Services must undergo a health screening for communicable disease after passing their Department of Justice/Live Scan. No physical exam is to be conducted. An initial pre-assignment health screening, and annually thereafter, are required and will be provided by the County at no cost. After clearance by EHS, an ID badge is issued by the facility on-site HR.

**Non-County Professional Staff Association (PSA)** are individuals not employed by DHS.

Individuals completing an application with Medical Administration must undergo a health screening for communicable disease after passing their Live Scan. No physical exam is to be conducted. An initial pre-assignment health screening, and annually thereafter, are required. The health screenings will be provided by the County at no cost. After clearance by EHS, an ID badge is issued by facility on-site HR.

**Shadows and Visiting Physicians** are non-County workforce members who are typically invited through formal invitation to view surgical or other procedures in the hospital.

Individuals who have been approved to participate in such opportunities must undergo a health screening for communicable disease. No physical exam is to be conducted. An initial pre-assignment health screening is required. The health screenings will be provided by the individual’s PLHCP via E2 form. After clearance by

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EHS, an ID badge is issued by facility on-site HR. If it is not feasible to obtain Live Scan results within the time frame allotted for the assignment, the non-County workforce member will be required to complete an affidavit attesting their criminal background status.

**Vendors** (persons who sell, repair or supply products and sales representatives).

Vendors who require access to patients or patient care areas are required to adhere to all facility infection control standards which include initial and annual health screenings, and immunizations. Refer to DHS Policy 822.001, "Vendor Representative Access Policy."

**SURVEILLANCE/EXPOSURE:**

(All non-County WFM's– No exceptions.)

Non-County WFM's who experience a potential exposure to an occupational hazard (e.g., needle sticks) may go to their facility EHS during business hours or Emergency Department for initial treatment within the treatment window. Emergency services provided post-exposure within the allowable time frames will be billed to the contractor or agency.

**NOTE:** Non-County WFM's exposed to an occupational hazard will not be included in our surveillance program. Their follow-up treatment and health assessments will be conducted through their personal physician or contract agency as required by law.

**REPORTING REQUIREMENTS:**

Non-County WFM's who are exposed to occupational hazard or incur injury while performing their duties for the County will be reported on the OSHA Log 300/301, as required by State and Federal regulations.

**AUTHORITY:**

California Code of Regulations,  
8 CCR § 5144, 5193, 5199  
17 CCR Chapters 4 and 8  
22 CCR §70723

**CROSS REFERENCES:**

DHS Policies:

705.000 Health Evaluation – DHS Employees  
705.001 Health Screening: Non-County Workforce Members  
925.000 Employee Health Services Program