



Moffitt Cancer Center

Policy: *Oversight of Non-Employed Moffitt Personnel (NEMP)*

Responsible Office: Office of General Counsel; Human Resources	Category: Governance and Administration
Authorized: Executive Vice President, General Counsel; Vice President, Chief Human Resources Officer	Policy Number: ADM-0012
Review Frequency: 3 years	Effective: 07/2017

Policy Statement

It is the policy of Moffitt Cancer Center (hereafter, "Center") to ensure a healthy, safe, and secure environment for patients, team members and guests. To achieve this, the Center maintains this policy for Non-Employed Moffitt Personnel (NEMP) for two main reasons:

1. to ensure that NEMP are competent to perform specified functions and/or are compliant to the needs of the Center, and
2. to provide a cohesive process for managing NEMP credentialing both onsite and remotely.

Purpose

The primary purpose of this policy is to provide clarification and guidance to management about the proper methods and systems in place to ensure necessary credentialing of NEMP.

Scope

This policy applies to all Center hiring managers and NEMP. Any NEMP who will be on site or remotely accessing the Center's network are subject to this policy.

All NEMP will adhere to all applicable Moffitt Policies and Procedures, and will abide by the laws and regulations of the State of Florida, the federal government, The Joint Commission (TJC), the Association of Registered periOperative Nurses (AORN), HIPAA Security and Privacy Rule, and any other applicable regulatory standards of practice.

Stakeholders: Supply Chain, Human Resources, Office of Faculty Affairs, Corporate Compliance, Safety/ Security, Cyber Security, Research, and Clinical Operations

Procedures

NEMP will be separated into two distinct groups: (i) NEMP with no IT access; and (ii) NEMP with IT access. Which process to follow shall depend on whether the NEMP requires IT access as applicable to his/her role.

1. NEMP with no IT access

This class of NEMP will be required to participate in the Center's third party vendor credentialing system, RepTrax, which is a web-based system utilized to manage vendor credentials at Reprax.com. Each NEMP will register with RepTrax, which will ensure current assessment and verification of the background, qualifications, certifications, vaccinations, and legitimacy of the NEMP.

I. **Registration**



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- a) Prior to conducting business with the Center, all NEMP within this class are required to register with RepTrax at <https://intellcentrics.com/>. Initial registration will be completed by the NEMP at their own expense. Upon confirmation of valid credentialing through RepTrax, the NEMP may make an appointment to visit the Center.

II. **Badge**

- a) NEMP are required to immediately visit the appropriate kiosk upon arrival to obtain a Center badge. Reprax kiosks are available at the locations detailed below.
 - (1) The Magnolia Campus main entrance (Red Valet)
 - (2) The Faculty Office Building (Blue Valet)
 - (3) The Clinic Building entrance (Gold Valet)
 - (4) The Stabile Research Center entrance
 - (5) The Moffitt Business Center main entrance
 - (6) The Moffitt McKinley Outpatient Center employee entrance
 - (7) The Facilities' Office on Magnolia Campus
- b) Any RepTrax NEMP or vendors who have business at the Fowler Avenue location need to check in at either the McKinley or Magnolia campus to obtain their badge and access card.
- c) Upon credential verification by the Reprax kiosk, a temporary photo badge that includes a photo, name, and visit details will be printed. Security staff shall direct NEMP to the approved appointment location or call the receiving department for instructions.
- d) Upon completion of each visit, NEMP must log out at one of the Center kiosks. Failure to log in or out could jeopardize future business with the Center.
- e) Failure to comply with these Procedures may result in the suspension or loss of NEMP's privileges and exclusion of the NEMP and/or NEMP's employer from further transactions with the Center. Length of privilege suspension will be determined on a case by case basis by the Moffitt Reprax Committee in consultation with the appropriate department(s).

III. **Enforcement of Policy**

- a) Any infraction of this policy may affect the NEMP's registration and access to the Center. Based on the seriousness of delinquency of the credentials, the NEMP will be reprimanded as follows:
 - (1) All NEMP that have not enrolled in Reprax will be denied the production of a badge and will consequently be denied access to the Center.
 - (2) Non-compliant NEMP will need to contact Reprax to determine the formal reason(s) for the denial of access and they will need to rectify the noncompliance with Reprax. No questions regarding the category requirements by the NEMP will be directed to the Center. All inquiries regarding compliance issues will be directed to Reprax for discussion and resolution. Any exceptions will be solely driven by emergent patient care need, which must be approved by both the OR Admin and the Chief Medical Officer or his/her designee, or emergent facility need, which must be approved by the Vice President Facilities or his/her designee.
 - (3) A report indicating all non-compliant NEMP will be routinely reviewed by the Moffitt Reprax Committee to determine the necessity of access for the NEMP and whether
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on-going access will be maintained.

- (4) Repetitive non-compliance by NEMP and/or their organizations may result in indefinite revocation of access to the Center.
 - (5) All current NEMP will receive a one-time, seven (7) day grace period to fix all expired credentials. During this grace period, if appropriate, masks must be worn at all times. If credentials are not compliant within seven (7) days, the NEMP's access will be revoked.
 - (6) New NEMP will receive a (7) day grace period to complete all credentialing requirements. During the grace period masks, if appropriate, must be worn at all times. If credentials are not compliant within (7) days the NEMP's access will be revoked.
- b) Circumvention of Policy:
- (1) Other credentialing systems, including Fast Pass, are not available for NEMP use. Fast Pass is in place only for Center team members who have forgotten their identification badges and for after hour/weekend visitors, and shall not be used by NEMP within this class.
 - (2) Using others' credentials will result in immediate suspension.
 - (3) Unless otherwise stipulated, infraction of this policy can result in the removal of the NEMP's registration and/or ability to access the Center.
- c) All Volunteers, regardless of access, will be managed through the Volunteer Services System.

IV. **Specific Exemptions**

- a) Certain NEMP without IT access may be exempted from going through RepTrax:
- (1) Clergy and visitors are not affected by this policy.

2. **NEMP with IT access**

This class of NEMP, both onsite and remotely, will be required to coordinate with Human Resources (hereafter, "HR") to assess and verify the background, qualifications, certifications, vaccinations, and legitimacy of the NEMP. Each category of NEMP will have unique obligations and requirements that pertain to the screening and onboarding process. Regardless of category, all NEMP with IT access are required to complete and submit the Human Resources HRIS Form for Non-Employed Moffitt Personnel before gaining access to the areas of the Moffitt network they need to perform their assigned tasks.

I. **Categories of NEMP**

- a) **Onsite NEMP**-Individuals who conduct work on behalf of the Center from an onsite location.
- i) Patient Care NEMP-Individuals who provide treatment, care or services to patients or who directly assist with patient care or procedures. Clinical NEMP will be required to complete all the same onboarding requirements consistent with employed individuals who provide the same treatment, care or services to patients.
 - ii) Research NEMP-Individuals who are focused on research-oriented tasks.
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- iii) Back Office NEMP-Individuals who are focused on information technology, revenue cycle, finance, and/or other similar support-oriented tasks.
- iv) Monitor NEMP-Individuals who are brought onsite temporarily by an independent third party to monitor clinical trials and data gathering for clinical trials.
- b) **Remote NEMP**-Individuals who conduct work on behalf of the Center from an offsite location and who do not come onsite to any Center campuses. Remote NEMP will be required to submit hostnames and IP addresses of systems that will be remotely accessed.
 - i) Academic Collaborator NEMP-Individuals whose institution has a formal research collaboration with Moffitt which defines an abbreviated onboarding process.
 - ii) Remote Back Office NEMP- Individuals who are focused on information technology, revenue cycle, finance, and/or other similar support-oriented tasks.
 - iii) International NEMP-Individuals whose primary location is outside of the United States. VP-level approval and additional screening and oversight is required for this category of NEMP.
 - iv) IT Support/Service NEMP-Individuals who need IT access for the purpose of troubleshooting issues or new installations within the IT department. When these accounts are necessary, the request to create such account will only be carried out upon approval by the Chief Information Officer (“CIO”) or Chief Information Security Officer (“CISO”). These accounts shall only be used when there is a Moffitt team member directly supervising the engagement.

II. Registration

All NEMP who need IT access:

- a) Present all required onboarding items, including the completed Human Resources HRIS Form, to HR prior to the NEMP’s first day of work at the Center. HR will also confirm that any licenses or certifications required for a position are active and clear of any disciplinary action via primary source verification when available. This information will be kept on file.
 - (1) Once required NEMP credentials have been submitted, the NEMP’s information will be added to HR’s ERP system.
 - (2) Access to any of the Center’s IT systems will not be granted unless the NEMP has been cleared by HR and added to the ERP. Once access is granted, NEMP are required to abide by Policy # ADM-C017 titled, “Confidentiality of Patient Information” and Policy # ADM-A015 titled “Acceptable Use of Information Resources”.
 - (3) If the NEMP is onsite, the Department is responsible for any Department orientation on the NEMP’s first day. Once completed, written acknowledgement of completion shall be sent to Human Resources to be kept with any other documents related to the NEMP.
 - (4) When the NEMP’s assignment is completed, the Department will be responsible for collecting any Center property, including Center badge, and filling out an Outprocessing Checklist (hereafter, “OPCL”). The OPCL should be forwarded to HR for inclusion in a file. IT will be notified to turn off any access to Center IT systems.
 - b) Agency Staff NEMP
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- (1) A "Temporary Staff Statement of Work" (hereafter, "SOW") form must be completed by Department management, approved by the Department VP or designee, and forwarded to appropriate Strategic Workforce Management team member in HR, prior to the Agency Staff NEMP starting at the Center.
- (2) Agency Staff NEMP will only be requested from employment agencies that signed the Center's Temporary Staff Agreement contract, unless there is an emergent need for staff, approved at the Vice President Level.
- (3) A purchase order must be completed and submitted by the Department to the Center's Purchasing Department prior to any Agency Staff NEMP starting work for the Center. All Agency Staff NEMP fees will be paid by the Department utilizing the Agency Staff NEMP.
- (4) Timesheets for Agency Staff NEMP should be signed by a manager or supervisor who has daily contact with the Agency Staff NEMP and can attest to their hours of work. Overtime is strictly prohibited for Agency Staff NEMP. Timesheets should not be used by any other NEMP.

III. Badge

- a) A badge will be created by Security once the NEMP with IT access has cleared registration pursuant to Policy #WR-06 titled, "Identification Badges."
- b) No NEMP will receive a badge unless they intend to be on site at the Center.
- c) If a remote NEMP with IT access needs onsite access, badging will be required pursuant to Policy #WR-06 titled, "Identification Badges" and a temporary badge will be created through Security.

IV. Enforcement

- a) Any infraction of this policy may affect the NEMP's registration and access to the Center. Based on the seriousness of delinquency of the credentials, the NEMP will be reprimanded as follows:
 - (1) All NEMP that have not enrolled with Human Resources will be denied the production of a badge and will in return be denied access to the Center.
 - (2) Non-compliant NEMP will promptly lose IT access, at a minimum, until compliance is reestablished.

V. Specific Exemptions

- a) Certain NEMP with IT access may be exempted from going through HR (Lawson):
 - (1) NEMP with Certain State or Federal Licenses
 - (a) NEMP who are officially licensed either by state or federal law and undergo rigorous background checks by virtue of their licensed profession may be exempt if they are signed off by the Executive Vice President overseeing their work.
 - (b) This exemption must be in writing and exempted consultant must be able to furnish said exemption if asked to do so by Moffitt officials.
 - (2) State or Federal Agency or Credentialing Inspector
 - (a) State or Federal Agency or similar Credentialing Inspectors are exempt from
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this policy.

- (b) Anyone qualifying under this exemption must be accompanied by Moffitt officials at all times while in Moffitt's facilities.
- (c) The Office of General Counsel must be notified of any state or federal agency or credentialed inspectors presence.

Forms

Department Orientation Checklist

Human Resources HRIS Form

Information Systems Confidentiality and Software Compliance Agreement

Outprocessing Checklist (OPCL)

Temporary Staff Statement of Work (SOW)

Related Information

Policy # ADM-A024 After Hours Visitor Badging

Policy # ADM-C017 Confidentiality of Patient Information

Policy # ADM-C030 Contract Management and Oversight

Policy # WR-06 Identification Badges

Policy # ADM-A015 Acceptable Use of Information Resources

Education

N/A

Definitions

Agency Staff NEMP-Temporary staff, both clinical and nonclinical, designed to provide short term (fewer than 6 months) service to the Center in lieu of an employed full time Moffitt team member.

Enterprise Resources Planning (ERP)-A database used by the Center to electronically track personnel.

Non-Employed Moffitt Personnel (NEMP) – Any Vendors, Trainees, and Volunteers, including off-site personnel. Unless specifically referenced, Agency Staff are included in the definition of NEMP.

Trainee – Residents, fellows, students and visiting scholars not employed by the Center.

Vendors – Any person who provides goods (solids, liquids or gases), or services to the Center, including all independent contractors, monitors and consultants.

Volunteer - An individual who performs hours of service without promise, expectation, or receipt of compensation for services rendered for the benefit of the Center. The total value of services provided by the Center to these individuals is substantially less than the total value of services they provide to the Center.



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Note: The members of the Center's Board of Directors are not considered Volunteers with respect to the performance of their duties as Board members.

References

N/A

Appendices

Exhibit 1 – Credentialing Requirement by Category

Exhibit 2 – Map of Reprax Kiosk Locations

Revision History

07/2017