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| Staffing Services | **Last Revision:** | February 2015 |
| **Last Reviewed** | June 2018 |
| **Applies to the following THA Group of Companies:** | * Island Health Care * Island Hospice * Independent Life at Home * RightHealth® * THA Services |
| **Included in the following THA Manual:** | Administrative Policies & Procedures  Leadership |

#### POLICY

**THA Group assumes sole responsibility for ensuring the safe, efficient, and effective delivery of all products and services, including patient care, regardless of whether those services are delivered directly or through contract employees.**

**PURPOSE**

This policy governs the process for delivery of services and products, either directly or through contract staff.

**PROCEDURE**

THA Group’s primary goal is to provide services directly through its own clinical and professional staff. At a minimum, at least one therapeutic service must be provided directly by THA Group staff.

When contract staff is used, THA Group has established the following requirements governing staff qualifications, coordination of care, employee supervision, and other components necessary to ensure quality patient care.

Orders for contract staff are submitted to Talent Management for processing. Talent Management confirms the request and required timeline for filling.

Contract staff requests must be approved by the President and CEO. Once approved, Talent Management contacts a professional staffing agency to initiate acquisition of individuals meeting the specific requirements of the position. All contractors must meet the same educational, licensing, background, and competency criteria established for regular status employees. Under no circumstances are contract staff allowed to begin work prior to THA Group’s receipt and verification of all credentials.

1. Obligations of the Professional Staffing Agency:
   1. Recruit, locate and assign supplemental personnel that meet the specific requirements of THA Group.
   2. Provide to THA Group all credentials required for the position, including but not limited to proof of successful completion of criminal background and drug screening, verification of competencies, all required licenses and permits, documentation of special education or training, evidence of health status and required tests/immunizations, minimum of two references, and Office of Inspector General’s List of Excluded Individuals/Entities Search.
   3. Provide documentation of all required compliance training
   4. Maintain general and professional liability insurance
   5. Notify THA Group promptly of the initiation of any action of which it is aware that would result in suspension, license revocation or limitation.
   6. Comply with all HIPAA privacy laws and regulations regarding HIPAA and HIPAA training
   7. Maintain continuous compliance with all applicable provisions of federal, state and local laws, rules and regulations.
   8. Assume responsibility for all payment of wages to their supplemental personnel
   9. All health care personnel shall be considered employees of the professional staffing agency, not of THA Group.
2. Obligations of THA Group:
   1. Provide sufficient specific information to enable the professional staffing agency to match the job requirements to the skills and experience of health care personnel.
   2. Provide direction, control and supervision to contract health care personnel.
   3. To the extent contract health care personnel provide health-related services to THA Group patients, ensure such services comply with all treatment plans and are consistent with the patient’s best interests as determined by THA Group.
   4. Ensure that, while under contract with THA Group, contract health care personnel comply with Federal, State and local statutes, rules and regulations, including all HIPAA regulations, and professional standards of care.
   5. Refrain from requiring contract personnel to perform in a manner other than that which is reasonable and customary within the profession.
   6. Provide information and policies to the professional staffing agency in order to orientate contract staff.
   7. Provide on-site orientation sufficient to ensure quality of care to THA Group patients.
   8. Notify professional staffing agency immediately in the event of issues with licensing, patient care, unexpected incidents and errors, suspicious behaviors and any complaints regarding health care personnel.
   9. Maintain an acceptable work environment and provide current and appropriately trained staff and supervisory personnel.