

WEST VIRGINIA UNIVERSITY
HEALTH SYSTEM
POLICY AND PROCEDURE MANUAL

Policy V.056S
1st Effective 08/19/2025
Revised 08/19/2025

Reviewed 06/09/2026

CONTINGENT WORKER, UNPAID INTERN-EXTERN, AND OTHER NON-EMPLOYEE ONBOARDING REQUIREMENTS

POLICY

To ensure compliance with guidelines of the Joint Commission and other accrediting or certifying bodies, West Virginia University Health System (WVUHS) use of contingent workers, unpaid interns/externs, and other non-employees requires a consistent approach to orienting each contingent worker, unpaid intern/extern or other non-employee.

DEFINITION

Contingent Worker. A contingent worker is one who performs services at WVUHS through a contractual arrangement. All contingent workers must satisfy the same standards and requirements expected of comparable employees (e.g. license verification, background check, orientation, competency assessment, etc.)

Unpaid Intern/Extern. A student or trainee who works without pay to learn and gain work experience.

Other Non-Employees. Any other non-employee is an individual who is on-site for a WVUHS approved purpose, aside from a contingent worker or unpaid intern/extern, such as a purchased services worker (one who performs services at WVUHS as part of a firm, corporation, or company that has been contracted to do business, and as part of that contract, may send various personnel onsite to carry out the work); an independent contractor (a person or entity that performs services at WVUHS pursuant to an agreement); or a volunteer (an individual who performs services for a non-profit for civil, charitable, religious or humanitarian reasons, without promise, expectation or receipt of compensation for services rendered). Additionally, school faculty members permitted to be on-site to lead intern/extern placements are other non-employees. Faculty members shall follow the onboarding procedure documented below for unpaid intern/externs & school faculty.

PROCEDURE

Any contingent worker, unpaid intern/extern or other non-employee must complete a set of requirements before they are permitted to provide services and/or be on-site at WVUHS. The department hosting a contingent worker, unpaid intern/extern, or other non-employee will notify the appropriate departments (i.e. Human Resources, Strategic Staffing Solutions, Compliance, Procurement, Volunteer Services, and/or Legal Services) at the onset to ensure that all requirements are satisfied before the contingent worker, unpaid intern/extern or other non-employee is permitted to begin working in their respective roles. Purchased services workers shall work through the Procurement Department to meet onboarding requirements; independent contractors shall work with the requested department to obtain compliance with onboarding requirements; and volunteers shall work with Volunteer Services to meet onboarding requirements.

CONTINGENT WORKER:

* West Virginia University Health System adopts this policy and procedure for WVU Hospitals, Inc.; Summersville Regional Medical Center; WVUHS Home Care, LLC; WVUHS Medical Group; Reynolds Memorial Hospital; Berkeley Medical Center; Jefferson Medical Center; Potomac Valley Hospital of W.Va., Inc.; United Summit Center; United Hospital Center, Inc.; Wheeling Hospital, Inc.; Barnesville Hospital Association; Harrison Community Hospital, Inc.; United Physician's Care, Inc.; St. Joseph's Hospital of Buckhannon, Inc.; Camden-Clark Memorial Hospital Corporation; Camden-Clark Physician Corporation; Braxton County Memorial Hospital, Inc.; Jackson General Hospital; Wetzel County Hospital; Uniontown Hospital; Allied Health Services, Inc.; West Virginia United Insurance Services, Inc.; Accountable Care Organization of West Virginia, LLC(ACO); AHS, LLC; Gateway Home Health Care, LLC; Peak Health Holdings, LLC; Garrett Regional Medical Center; Princeton Community Hospital Association, Inc.; Grant Memorial Hospital, Inc.; and Thomas Health System, Inc.

The department must ensure all requirements have been met before the contingent worker is permitted to provide services and/or be on-site at WVUHS.

Onboarding Requirements – All contingent workers are subject to the terms and conditions outlined in the agreement between WVU Health Systems and the contracting agency or company. Contingent workers must complete the compliance module review prior to or no later than their first day.

See Attachment A for details on onboarding requirements.

UNPAID INTERN/EXTERN, SCHOOL FACULTY & INDEPENDENT CONTRACTOR:

All unpaid intern/extern and school faculty onboarding requirements are subject to the terms and conditions outlined in the affiliation agreement between WVUHS and the contracting school. All independent contractor onboarding requirements are subject to the terms and conditions outlined in the contract between WVUHS and the independent contractor. The departmental manager must ensure an affiliation agreement or contract is in place with the contracting school or independent contractor prior to agreeing to an unpaid intern/extern, school faculty or independent contractor placement. If an agreement is not in place, or if the department is unsure if an agreement is in place, the department must contact an appropriate department (i.e. Legal Services.)

Onboarding Requirements – All unpaid intern/externs, school faculty, and independent contractors must complete compliance module review prior to their first day on-site. The department is responsible for confirming all applicable onboarding requirements are satisfied, identified in Attachment A prior to permitting the unpaid intern/extern, school faculty, or independent contractor on-site at WVUHS. Medical students will complete EPIC training in Workday.

The department and/or contracting school must complete primary source verification of licensure/certifications, as applicable, for clinical positions. The contracting school or independent contractor should retain documentation of required criminal background check, immunizations, and drug and alcohol testing, as applicable. The department is permitted to retain compliance documentation as well, but is not required to, provided that the contracting school or independent contractor must provide compliance documentation upon the request of WVUHS. A fingerprint-based criminal background check is required for school faculty located in West Virginia Department of Health and Human Resources (WV DHHR) regulated areas. The department must coordinate DHHR criminal background checks through the hospital's local Human Resources department. The department shall refer to Attachment B for specific immunization and drug/alcohol screening requirements. Contact hospital Human Resources if uncertain whether a DHHR fingerprint-based criminal background check is required.

If an unpaid intern/extern, school faculty, or independent contractor has completed a placement at WVUHS previously, the new placement department must confirm that the unpaid intern/extern, school faculty, or independent contractor has completed the appropriate compliance modules within the last 12 months. If it has been longer than 12 months since the compliance modules have been completed, the unpaid intern/extern, school faculty, or independent contractor is required to complete again.

The department will provide placement approval and a start date to the unpaid intern/extern, school faculty, or independent contractor after the department has ensured all onboarding requirements are satisfied.

Unpaid intern/externs and school faculty shall utilize their school-issued identification badge containing a photo. If an unpaid intern/extern or school faculty does not have a school-issued identification badge containing a photo, a WVUHS badge must be obtained through Human Resources. All independent contractors must obtain a WVUHS

**This paper copy has been retrieved from the Policy Management System.
To confirm that this policy remains active and/or has not been updated,
please log onto the Policy Management System.**

issued photo ID badge. In these instances, unpaid interns/externs and school faculty are responsible for scheduling an appointment for a WVUHS photo ID badge with Human Resources.

OTHER NON-EMPLOYEE:

Purchased services workers – Departments shall work with Procurement to ensure onboarding requirements are satisfied for purchased service workers.

If a department is uncertain of which category (contingent worker or purchased service worker) a worker falls under, they should contact Strategic Staffing Solutions for guidance.

Independent Contractors – Departments, in conjunction with the independent contractor or entity, shall be responsible for ensuring onboarding requirements are satisfied before the independent contractor presents on site to provide services. Independent Contractors must complete an Exclusion Form so that Compliance can run monthly Office of Inspector General/Health Sanction Searches. The Exclusion Form can be obtained in the WVUHS Leadership Toolkit on HROneSource and the department is responsible for submitting the form to Compliance.

Volunteers – Departments shall work with Volunteer Services to ensure onboarding requirements are satisfied for volunteers.

School Faculty – Departments, along with contracting schools, are responsible for ensuring onboarding requirements are satisfied for school faculty.

ATTACHED DOCUMENTS:

Attachment A – Unpaid Intern/Extern, School Faculty & Independent Contractor Onboarding Requirements

Attachment B – Immunization Exemption Attestation for Unpaid Interns/Externs

RELATED POLICIES:

Policy V.050S EMPLOYEE CLASSIFICATIONS

Albert L. Wright, Jr.
President & CEO

Author: Director, Human Resources

This paper copy has been retrieved from the Policy Management System.
To confirm that this policy remains active and/or has not been updated,
please log onto the Policy Management System.

Attachment A

Contingent Worker Onboarding Requirements

All contingent workers must satisfy the onboarding requirements outlined below prior to their first day on-site at WVUHS.

Requirement	Population	Retention Location	Responsibility	Contact
Primary source verification of licensure/certifications for clinical positions, as applicable	Clinical placements only	Departmental file, School* or Contracting Agency *	Department, School/Contracting Agency/Human Resources	Department, School/Contracting Agency/Human Resources
Office of Inspector General/Health Sanctions Search, as applicable	Independent Contractors	Compliance	Department/Contracting Agency	Compliance
Standard criminal background check, as applicable	All	Departmental file, School* or Independent Contractor*	Department/School/Contracting Agency	Department, School/Contracting Agency/Human Resources
Fingerprint-based criminal background check	Placements in DHHR regulated areas	Human Resources	Department	Human Resources
Identification badge issued by either the school or WVUHS, if Intern/Extern does not have school-issued photo ID. All independent contractors require WVUHS issued photo ID badge	All	Intern/Extern or School Faculty or Independent Contractor	Intern/Extern or School Faculty / Contracting Agency/ Department	Human Resources or Local Security Department
Immunization, titer, and Tuberculosis testing records, as applicable	All**	Department School* or Contracting Agency*	School / Contracting Agency / Department	Department, School/Contracting Agency/Employee Health
Drug testing, as applicable	Only if unsupervised	Departmental School* or Contracting Agency*	School / Contracting Agency / Department	Department, School/Contracting Agency/Employee Health

This paper copy has been retrieved from the Policy Management System.
To confirm that this policy remains active and/or has not been updated,
please log onto the Policy Management System.

WVUHS Complete Required CBLs.	All	Workday	Intern/Extern or School Faculty / Independent Contractor / Department	Department, School/Contracting Agency
Onboarding Tasks: Edit Government ID Change Emergency Contact Update Personal Information Review Documents Code of Ethical Agreement review and attestation Confidentiality and Security Agreement review and attestation	All	Workday	Intern/Extern/School Faculty/Independent Contractor	Onboarder/HRBP

**Documentation of these requirements may be maintained by the contracting school or independent contractor, instead of the departmental file, although the contracting school/independent contractor is required to produce documentation of satisfied compliance requirements upon the request of WVUHS.*

***Required unless exemption granted by HR/Employee Health (see Attachment B) for departments with physical locations on non-clinical sites and performing tasks outside those in a clinical setting.*

Employee Health Onboarding Checklist for Students or Contractors

_____ Hepatitis B Titer (Immune titer is required only for those contractors working in areas where they may be exposed to blood and/or body fluids.)

_____ Measles, Mumps, and Rubella (Immune Titers or Evidence of 2 vaccine doses)

_____ A documented negative Purified Protein Derivative (PPD) two-step documentation of a negative skin test OR Quantiferon/interferon-gamma release assay (IGRA) blood testing OR T-spot OR a copy of the most recent chest x-ray in the event of a history of a positive tuberculosis (TB) test **within the last 12 months**

- Those who have traveled internationally to TB prevalent country in the last 21 days must receive a TB test within 30 days of entering our facility (<https://www.cdc.gov/yellow-book/hcp/travel-associated-infections-diseases/tuberculosis.html>)
- Those that do not receive a TB test annually must complete a TB Symptom Review to check for symptoms.

This paper copy has been retrieved from the Policy Management System.
To confirm that this policy remains active and/or has not been updated,
please log onto the Policy Management System.

- _____ Tetanus, Diphtheria, Pertussis (Tdap) Immunization
- _____ Varicella/Chickenpox (Immune Titer or Evidence of 2 vaccine doses)
- _____ Influenza Immunization or Approved Medical or Religious Exemption Form. Mandatory during Oct.1 - May 1st.
- _____ Urine Drug Test within last 30 days (screening must include the following 12 drugs: amphetamines, barbiturates, benzodiazepines, buprenorphine, cocaine, methadone, MDMA, methamphetamines, opiates, oxycodone, PCP, TCA)

This paper copy has been retrieved from the Policy Management System.
To confirm that this policy remains active and/or has not been updated,
please log onto the Policy Management System.

Attachment B

**IMMUNIZATION EXEMPTION ATTESTATION FOR FULLY REMOTE
UNPAID INTERNS / EXTERNS**

NAME OF SUPERVISOR: _____

DEPARTMENT: _____

NAME(S) OF UNPAID
INTERN(S) / EXTERN(S): _____

APPROXIMATE DATES
OF INTERN/EXTERNSHIP: _____

With regard to the unpaid intern(s) / extern(s) identified above and the expected intern/externship experience, I certify that each of the following are **TRUE AND ACCURATE**:

- I understand and agree to oversee the above identified intern(s)/extern(s) during the internship/externship on the approximate dates above.
- I understand the anticipated internship/externship programs such that I am qualified and authorized to submit this Immunization Exemption Attestation.
- I certify that the above identified intern(s)/extern(s) are not physicians, nurses, nursing assistants, therapists, technicians, emergency medical service personnel, dental personnel, pharmacists, laboratory personnel and/or clinical trainees of any type.
- I certify that this Department is not physically located on a clinical site and further that the intern(s)/extern(s) will not be working in clinical areas or environments at the Hospital or at other clinical sites throughout the duration of the internship/externship.
- I certify that the internship/externship will not cause the intern(s)/extern(s) to interact with patients or patients' families or visitors throughout the duration of the internship/externship and will not otherwise be performing clinical functions.
- I certify that the internship/externship will not cause the intern(s)/extern(s) to be exposed or potentially exposed to infectious materials throughout the duration of the program; and
- I certify that I have not and will not request Electronic Medical Record (EMR) access for the above-specified intern(s)/extern(s) and that they will not otherwise have access to the EMR.

In the event this Immunization Exemption is granted, I understand that it is my responsibility to ensure that the expectations of the internship/externship remain consistent with the certifications provided in this submission and that if the expectations do change, I will ensure the compliance of the intern(s)/extern(s) with immunization requirements before permitting them to be in clinical areas or environments, in contact with patients and their families and visitors, and exposed or potentially exposed to infectious materials.

To the extent this Immunization Exemption is granted, I understand that my failure to adhere to these requirements may result in suspension and/or termination of my department's internship/externship program.

I agree and acknowledge all the information above.

**This paper copy has been retrieved from the Policy Management System.
To confirm that this policy remains active and/or has not been updated,
please log onto the Policy Management System.**

Supervisor Signature: _____ Date: _____

This paper copy has been retrieved from the Policy Management System.
To confirm that this policy remains active and/or has not been updated,
please log onto the Policy Management System.