

## 5.2.5 Educational Rotation Program

### (a) Policy

- (1) California Correctional Health Care Services (CCHCS) provides patients with timely access to safe, effective, and efficient medical care and integrate the delivery of medical care with mental health, dental, and disability programs. CCHCS and the Division of Health Care Services (DHCS), California Department of Corrections and Rehabilitation (CDCR), may enter into agreements with accredited health care educational entities to provide broader clinical and educational experiences to students.
- (2) This policy provides guidance regarding the laws, rules, and processes related to the Educational Rotation Program for CCHCS and DHCS. This policy applies only to unpaid educational rotations. Residencies and other situations in which compensated health care services are provided are handled via a health care services agreement that CCHCS' Medical Services Section solicits and are not governed by this policy.

### (b) Benefits to Students

An educational rotation provides benefits to students which include, but are not limited to:

- (1) Providing an opportunity to fulfill clinical requirements necessary to graduate.
- (2) Providing clinical experiences that integrate education, career development, and public service.
- (3) Providing the opportunity to apply knowledge and skills in a professional setting while still in school.
- (4) Enhancing the students' resumes.
- (5) Providing networking and job reference opportunities.
- (6) Exposing students to health care in a correctional setting.
- (7) Increasing self-confidence.

### (c) Benefits to Employees

An educational rotation provides benefits to CCHCS and DHCS employees which include, but are not limited to:

- (1) Exposing employees to new ideas, viewpoints, and energy.
- (2) Fostering positive public relations.
- (3) Serving as a recruitment tool.
- (4) Providing opportunities to engage in clinical training.
- (5) Allowing CCHCS, DHCS, and educational entities to build and strengthen relationships.

### (d) Request Process

Educational entities contact the Educational Rotation Program Contract Liaison (CL) (i.e., program-designated analyst at headquarters [HQ]) for CCHCS and/or DHCS. If contacted by an educational entity, Workforce Development Unit (WDU) and/or the program should refer the educational entity representative to the CL. Furthermore, when a student contacts HQ or an institution directly, the CL must work with the student's educational entity representative (i.e., Contractor's Designated Faculty Member [CDFM]) to formalize educational rotation participation.

- (1) The Educational Entity Representative contacts the CL to request educational rotation participation.
- (2) The CL:
  - (A) Confirms the educational program's accreditation status and other details (e.g., public, private, or for-profit college).
  - (B) Confirms the nature of the educational experience in terms of:
    1. Type of program
    2. Number of student participants
    3. Amount of time students will spend on-site
  - (C) Confirms the program's desire to participate in educational rotations for the specific course of study.
  - (D) Confirms collective support for the program from program/institutional executives, including, but not limited to:
    1. Chief Executive Officer (CEO)
    2. Chief Medical Executive (CME)
    3. Chief of Mental Health
    4. Supervising Dentist
    5. Other executives or program directors based on the type of program request being made
- (E) Ensures the program/institution has the clinical support for conducting the proposed program with:
  1. Adequate space and equipment for the educational student population

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2. Appropriate staff participation
  3. On-site time requirements for the participants without negatively impacting program operations
- (F) Coordinates with nearby institutions and/or regional or statewide executives for rotations that would be appropriate for multiple institution participation
- (G) Begins preparation of the scope of work (SOW) for the interagency agreement (IA) or contract.
- (H) Notifies WDU of the pending educational rotation details by providing a copy of the IA or contract.

**(e) Procurement/Contracting Requirements**

- (1) Although CCHCS' educational program agreements are zero dollar (\$0.00) contracts, educational rotation programs must go through the procurement/contracting process to establish an IA or a contract. While these agreements are not contracts for services, compliance with these requirements mitigates legal risk to CCHCS and DHCS.
- (2) An IA or contract primarily consists of an SOW and several exhibits that are attached to the SOW that define essential features or terms of the agreement including, but not limited to:
  - (A) [Business Associates Agreement \(HIPAA\)](#)
  - (B) Patient Privacy Regulations and [Non Redisclosure Agreement](#)  
**NOTE:** Health Insurance Portability and Accountability Act (HIPAA) language cannot be waived for private, for-profit, or out-of-state colleges. In the case of California State or University of California colleges, a Non Redisclosure Agreement can be used in lieu of the HIPAA language. The HIPAA Agreement and/or Non Redisclosure Agreement should be retained for three years.
  - (C) Insurance requirements for schools and students
  - (D) California Code of Regulations, Title 15, disclosures
  - (E) Indemnification issues

**(f) Procurement/Contracting Process**

The procurement/contracting process for educational rotation programs is as follows:

**NOTE:** Edits to the related exhibits must be routed and approved by HQ and the CCHCS Office of Legal Affairs (COLA) and/or Department of General Services, depending on the contract changes (e.g., insurance requirements, indemnification issues).

- (1) The Procurement Contract Analyst guides relevant program/institution and educational entity staff through the contracting process.
- (2) The Host Program/Institution Educational Leadership (e.g., CEO/CME):
  - (A) Writes a draft SOW that defines the following core features:
    1. Activities
    2. Requirements
    3. CLs
    4. Proposed on-site activity in terms of how many students may participate over what time period
  - (B) Submits the draft SOW to the CL.
- (3) The CL submits the draft SOW to the CDFM for review, comments, and proposed revisions.  
**NOTE:** CCHCS and/or the CDFM may revise the draft SOW until it is suitable to both parties.
- (4) The CDFM reviews the SOW and provides comments and proposed revisions to the CL.
- (5) The CL:
  - (A) Submits the SOW agreed upon by CCHCS and/or the CDFM to the Procurement Contract Analyst.
  - (B) Completes and submits a [CDCR Form 886B, Contract Request Form](#) to the Procurement Unit.
- (6) The Procurement Contract Analyst:
  - (A) Adds the required exhibits.
  - (B) Prepares and forwards the complete IA or contract, including all necessary exhibits, to the CDFM for review.
- (7) The CDFM reviews the IA or contract.  
**NOTE:** Any requested changes must be routed back to the Procurement Contract Analyst.
- (8) The Procurement Contract Analyst:
  - (A) Reviews the IA or contract changes requested by the CDFM, if applicable.
  - (B) When necessary (i.e., edits to the exhibits), forwards the requested IA or contract changes to COLA for review.
  - (C) When the IA or contract is acceptable to all parties, completes the [STD Form 213, Standard Agreement](#).
  - (D) Provides a copy of the final IA or contract to WDU.
- (9) COLA:
  - (A) If consulted, reviews, suggests changes, or considers proposed changes to the IA or contract.

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(B) Notifies the Procurement Contract Analyst of the recommendation.

(10) The Procurement Management/Educational Entity Officials executes the IA or contract.

(11) The WDU monitors the overall progress of the Educational Rotation Program.

**NOTE:** While the current contract is still in progress, requests may be initiated to extend or modify the educational rotation. In such cases, a [STD Form 213A, Standard Agreement Amendment](#) is processed via the Program Contract Analyst.

**(g) Program Coordination**

The tactical decisions and activities related to having students on-site are as follows.

**NOTE:** The coordination efforts may occur concurrently with the procurement/contracting process (see above), or the CL and CDFM may wait until the contract is fully executed before beginning the coordination efforts

(1) The CDFM:

(A) Determines the exact calendar schedule.

1. The schedule is especially critical for those programs where a cohort class of multiple students will be on-site for a number of days each week over an instructional period.
2. For programs where a single student/intern/resident/master's candidate will be on site, the student typically contacts the school's CDFM regarding a correctional educational rotation. In such cases, the CDFM will coordinate with the CL or connect the student with the CL to make arrangements.

(B) Ensures students meet the tuberculosis (TB) testing requirement no earlier than 30 days prior to the start of on-site activities.

(C) Ensures the CL receives the appropriate TB documentation on all participants.

(D) Provides the CL with detailed information (e.g., background check) and signed Non Rediscovery Agreement on every student who will be involved in the program, including the information necessary to conduct future LiveScan processes.

**NOTE:** Each student is individually accepted or rejected by the CL or designee as authorized by the program Director or CEO

(2) The CL provides WDU with contact information on all student participants.

**NOTE:** The information will be used to track and ultimately recruit students

(3) The CL/CDFM (in collaboration with each other) ensures every student is provided onboarding/orientation that introduces the student to the relevant aspects of interacting with inmates in an institutional setting prior to arrival on-site.

(4) The CL:

(A) Ensures access details are confirmed prior to the student/faculty arrival to the institution, including, but not limited to:

1. Background check (e.g., LiveScan)
2. Signed Non Rediscovery Agreement

(B) Notifies the Warden and/or other appropriate correctional personnel of the need to admit and escort students to and from the program clinical settings.

**(h) Training**

The designated program/institution staff will:

(1) Establish a training program that provides clear expectations for students, including the basis for evaluation.

(2) Allow students to participate in appropriate activities and meetings.

(3) Instruct the students on specific skill development tasks.

(4) Facilitate active learning by explaining, clarifying, and encouraging the students to ask questions at appropriate times.

(5) Provide experiences that offer a broad overview of the work and organization.

**(i) Selecting Educational Program Preceptors and Contacts**

(1) Any institution that participates in an educational program must have a designated on-site Educational Program Preceptor who is responsible for providing orientation of students and faculty and who oversees the educational experience of the students.

(2) The designated on-site Educational Program Preceptor shall be available to students and faculty on a regular basis and shall possess expertise in the clinical area in which the student will rotate.

(3) Even if the student will rotate through various units to gain broad-based experience, there should be a single overall Educational Rotation Program Contact who oversees the educational rotation as a whole.

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- (4) When choosing an Educational Program Preceptor and/or Educational Rotation Program Contact, it is important to select a staff member who:
- (A) Is interested in working with college students.
  - (B) Has time to invest in the educational rotation.
  - (C) Possesses qualities such as leadership, strong communication skills, and patience.

**NOTE:** An employee may not be required to participate in the Educational Rotation Program.

**(j) Educational Program Preceptor Responsibilities**

The Educational Program Preceptor has the following responsibilities:

- (1) Ensure students and faculty complete the Health Care On-Site Medical Student/Resident Orientation Self Certification module prior to beginning the educational rotation, and retains the signed Self-Certification Form(s).  
**NOTE:** The Self-Certification Form is located at the end of the module and should be retained for one year following the educational rotation period ending date.
- (2) Oversee and assign the students' tasks.
- (3) Identify the different expectations between the clinical site and school to help students make a successful transition to the clinical environment.
- (4) Establish regular one-on-one meetings to:
  - (A) Communicate goals, objectives, and expectations
  - (B) Review progress on assignments
  - (C) Provide clinical guidance
  - (D) Provide feedback, guidance, and support
  - (E) Discuss successes, areas for improvement, and overall performance
  - (F) Maintain open, two-way communication
- (5) Track and submit students' time to the CDFM, if requested.
- (6) Submit student evaluations to the CDFM, if requested
- (7) Ensure students return any departmental property and that electronic accesses (e.g., Electronic Unit Health Record [eUHR], Electronic Health Record System [EHRS], Mental Health Tracking System [MHTS]) are cancelled at the conclusion of the educational rotation.
- (8) May provide students with a letter of recommendation, if requested.

**(k) Student Responsibilities**

Students have the following responsibilities:

- (1) Adhere to departmental policies, procedures, and rules governing professional behavior.
- (2) Report to the clinical site on time and prepared to complete the required number of hours agreed upon by the educational program.
- (3) Notify the Educational Program Preceptor if he/she is unable to report when scheduled.
- (4) Behave and dress appropriately for the institutional clinic environment.
- (5) Respect the confidentiality of the institutional clinic environment, employees, and patients.
- (6) Execute a Non Rediscovery Agreement prior to participation.
- (7) Discuss any problem with his/her Educational Program Preceptor and, if necessary, the CDFM.

**(l) Student Rights**

Students have the same legal rights as State employees regarding protection against discrimination and harassment. Students are not employees of the State, CCHCS, or CDCR, and do not have the same rights as State employees in other areas, including workers' compensation, unemployment compensation, participation in the Public Employees Retirement System, civil service employee disciplinary procedures, or any other rights afforded to State employees based on civil service employment.

**(m) Student Schedule**

Schedules shall be flexible depending on the individual educational requirements and Educational Program Preceptor's schedule and availability.

**(n) Student Evaluations**

- (1) Evaluation of performance is important to the student's development, and should be provided throughout the entire rotation.
- (2) Regularly scheduled evaluations help avoid:
  - (A) Miscommunication
  - (B) Misunderstanding of clinical responsibilities

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(C) Failure to achieve specific goals and objectives

**(o) Educational Rotation Completion**

- (1) An educational rotation should have a clearly stated end date that is identified before the educational rotation begins.
- (2) At the end of the educational rotation, the Educational Program Preceptor may:
  - (A) Provide clinical students with a letter of recommendation, if requested
  - (B) Provide evaluations to the students' educational program (e.g., evaluations required for academic credit), if requested
- (3) The Educational Program Preceptor ensures clinical students return any departmental property and that electronic accesses (e.g., eUHR, EHRS, MHTS) are rescinded.
- (4) The Educational Program Preceptor notifies WDU when the educational rotation is completed.
- (5) WDU retains the clinical students' contact information in order to notify students about potential job opportunities.

**(p) Recruitment of Student Graduates**

Candidates who have participated in a correctional educational rotation provide an important recruitment and retention opportunity for CCHCS and DHCS, since such candidates have already been introduced to experiences unique to the correctional health care environment. To take advantage of the opportunity to recruit these student graduates, WDU shall:

- (1) Maintain an up-to-date roster of all programs and students, including student contact information.  
**NOTE:** The roster information shall be provided by the CL to WDU prior to any rotation.
- (2) Survey student via e-mail approximately one to two weeks after the end of the students' educational rotation to better understand how the students reacted to the experience (e.g., what the students liked and did not like). Survey Educational Program Preceptors, and other clinical leaders who observed educational rotation students, via e-mail approximately one to two weeks after the end of the students' educational rotation.
  - (A) All surveys will be administered using available survey tools (e.g., Survey Monkey).
  - (B) Survey results will be assessed by WDU to ensure efficacy of the program.
  - (C) Data will be compiled and shared with the relevant CCHCS management, enabling CCHCS to improve the education programs.
- (3) Create a talent pool within the CCHCS and DHCS, Applicant Tracking System.
- (4) Remain in contact with students as part of CCHCS' and DHCS' recruitment efforts.
- (5) Share student hiring data and feedback with stakeholders.

**References**

- United States Code, Title 29, Chapter 8, Fair Labor Standards Act
- California Department of Human Resources, Student Internship Program Guide

**Revision History**

Effective: 12/2015