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THE ASCA JOURNAL | NOVEMBER/DECEMBER 2025 | *ascfocus.org*

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SECURITY AND COMPLIANCE BEST PRACTICES FOR PART-TIME STAFF

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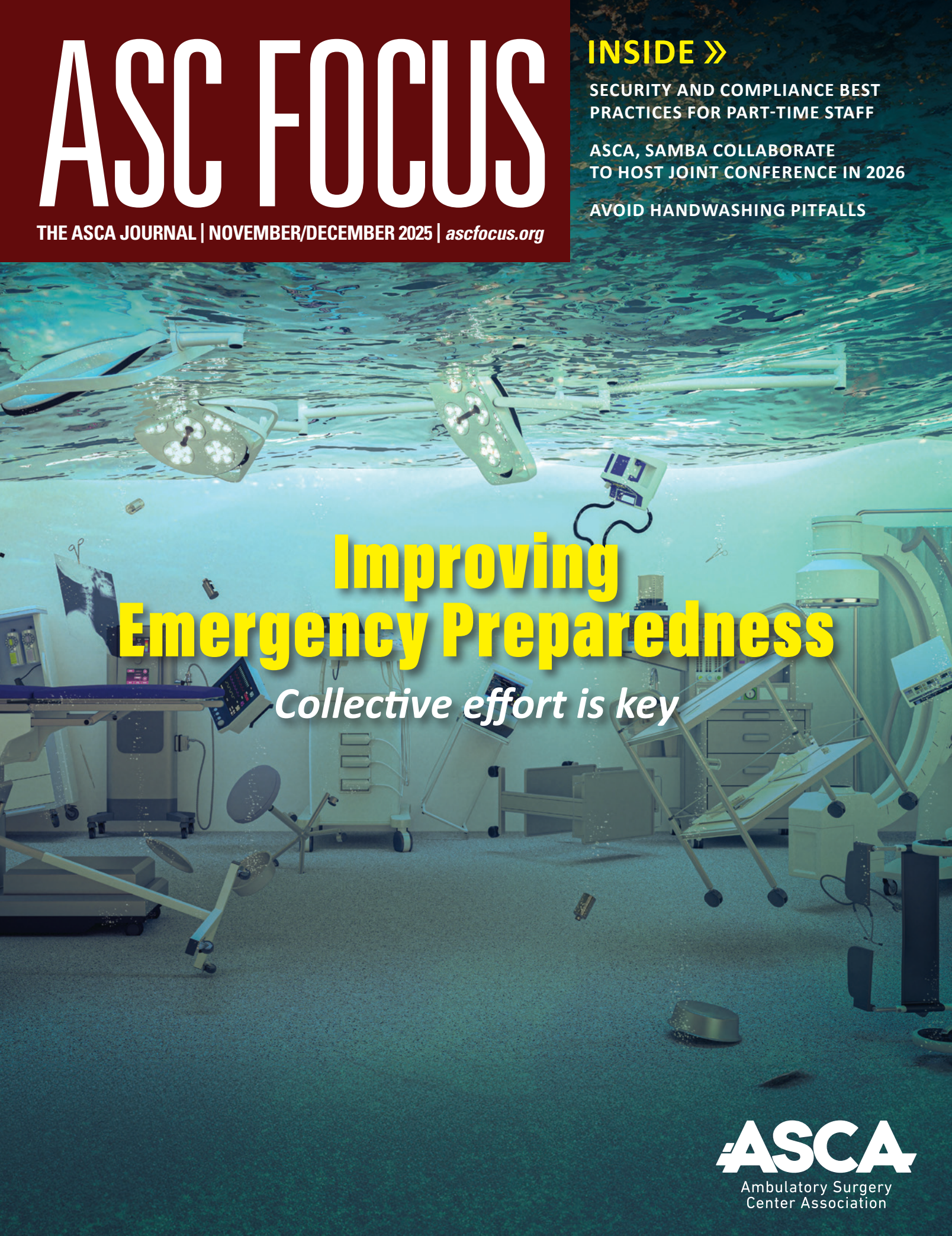
AVOID HANDWASHING PITFALLS



Improving Emergency Preparedness

Collective effort is key

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Security and Compliance Best Practices for Part-Time Staff

Consistent training is hard to maintain with PRN labor

BY ROBERT KURTZ

KEY LEARNINGS

- Hire experienced nurses
- Ask for references
- Provide strictly the tools and permissions needed for their roles

"I was not properly trained" is a common excuse after a compliance problem surfaces at a healthcare facility, says Douglas Yang, a partner in the Los Angeles, California, office of law firm Sheppard Mullin.

Yang has seen how the likelihood of such a scenario increases with reliance on part-time, agency, travel or pro re nata (PRN) labor. "Full-time employees benefit from consistent training on a recurring basis," he says. "With part-time staff, that consistency is harder to maintain." It is not usually the big picture around security and compliance that gets lost, he says. Problems typically arise in the gray areas—the ASC-specific details and nuances. "Every ASC has its own ways of doing things, sometimes down to very fine details, and making sure part-time staff understand and follow those expectations can be a greater challenge."

> *"You need managers who are strong on process and willing to serve as educators to ensure that part-time staff provide the same standard of care that patients expect from the ASC."*
>
> *—Douglas Yang, Sheppard Mullin*

At UroPartners Surgery Center in Des Plaines, Illinois, part-time and PRN staff are a regular part of the team. Some work only one or two days a week, while others pick up what the ASC calls "princess shifts"—short blocks to help cover the midday rush or provide lunch relief. Administrator Catherine McCue, RN, acknowledges that those who spend less time in the ASC are more likely to miss some in-person education and training. Still, she stresses that this cannot be an excuse for security and compliance shortcomings. "We are very regulated, and surveyors are looking to ensure our entire team knows what they must do, even those here less often than others," she says.

Laying the Groundwork for Success

When Joyce Mackler, RN, CASC, CAIP, ASC manager for Peninsula Eye Center in Salisbury, Maryland, hires part-time staff, she puts them through the same process as full-time candidates, including securing three references. "Just because they will not be here as often does not mean they undergo any less scrutiny," she says.

Mackler looks for individuals with a proven track record. "The per diem nurses I have brought on were often semiretired but still wanted to work," she says. "They come to us largely understanding requirements and are easier to train."

McCue takes a similar approach. "We only hire experienced nurses and staff," she says. "They need to have a background in OR [operating room], PACU [post-anesthesia care unit], ICU [intensive care unit] or ER [emergency room]. We want people who already have real surgical experience."

As some ASCs begin to explore AI tools to help with hiring, Yang urges caution. "AI is largely unregulated, so it is important to ask vendors tough questions about how their platforms work, what their data privacy and security protocols are, what kinds of testing

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they have conducted on the platforms, and what their limitations are."

When new part-time staff join her center, Mackler stresses concentrated onboarding during the first month. She asks new team members to commit to being in the ASC multiple days a week to receive a full orientation in critical security and compliance areas like fire safety, disaster preparedness, emergency procedures, Occupational Safety and Health Administration, risk management and *Health Insurance Portability and Accountability Act of 1996* (HIPAA).

Yang notes that HIPAA can be especially challenging for part-time employees. "Part-time staff members spend less than half of a full workweek at an ASC, and there is no guarantee they are reinforcing that HIPAA knowledge elsewhere," he says. "Some may work in another ASC, but others may be in settings where HIPAA compliance is not a focus. That makes it even more important to ensure they are fully up to speed on HIPAA's privacy and security rules so there are no compliance gaps."

This knowledge is particularly important because of what Yang calls a "commingling information" challenge. Staff who work at multiple facilities might unintentionally carry details from one site to another—for instance, referencing a patient in the wrong setting or applying one site's practices to another that performs the same task differently.

At UroPartners, participation in quarterly disaster drills, including active shooter, is mandatory for staff at all levels. Attendance at staff meetings, where security and compliance are regularly discussed, is not. To keep part-time staff informed, McCue circulates detailed minutes and encourages questions. "Staff know my door is always open to them," she says.

Mackler has used her electronic health record's internal messaging to keep part-time staff current on rules.

"If there is a major change in how we do something, we can message the entire staff," she says. "As soon as they log in, they see it."

When ASCs rely on part-time staff, the demands on managers grow, Yang says. Managing a rotating group of part-timers is not the same as overseeing a stable team of full-time employees. "With increased reliance on part-time staff, business process standardization comes under pressure," he says. "You need managers who are strong on process and willing to serve as educators to ensure that part-time staff provide the same standard of care that patients expect from the ASC." Part-time staff almost always require more frequent and focused training than full-time staff, particularly on facility-specific practices, accreditation requirements and regulatory standards. "Managers need to recognize and act quickly when someone is struggling to keep up."

McCue requires that a full-time employee be present from opening through closing. "If we have an emergency, the full-time people who are here every day are going to respond quicker than PRNs," she says. McCue also sees value in pairing full-time and part-time staff. "The part-time staff may notice changes or details the full-time staff overlook because they have fresh eyes, while the full-time staff bring the daily experience and knowledge."

Limiting access is another way to strengthen security and compliance when working with part-time staff, Mackler says. She makes sure they have only the tools and permissions needed for their roles. "I do not give per diem or part-time people keys to the building. They do not make purchases, so they do not have access to accounts, and they cannot use the broader systems reserved for full-time employees," she says. "You have to ask: What does this person really need?" The less unnecessary access is given, she adds, the lower the risk to security and compliance.

Do Not Hesitate to Correct Course

Yang notes that part-time and PRN jobs demand flexibility and a willingness to keep learning across multiple organizations. "State regulations, accreditation requirements, changes in federal law and each employer's policies—there is a lot to keep up with, and that workload grows when someone is concurrently working with multiple organizations," he says. "Some people thrive in that environment, but others struggle. The important thing is recognizing whether a candidate can realistically handle the demands of the role."

McCue makes sure those realities are addressed head-on in her center. She holds every team member to the same standards and acts quickly when those standards are not met. "We do not have many people we can call on at the last minute, but that does not mean we will keep someone who is not fulfilling their role and meeting our needs," she says. "If someone is late, puts coworkers at risk or brings the wrong attitude, that is not the type of person we want working here." «