



Regulatory Deadline Approaching for New Jersey Health Care Facilities

Client Advisories

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We are sending this alert to direct your attention to the fact that a little known regulatory deadline is rapidly approaching for all New Jersey licensed health care facilities. Under the recently promulgated N.J.A.C. 8:43E-14.1 et seq., every health care facility must provide training to their personnel who have direct contact and/or interact with patients and/or patient visitors in recognizing and responding to suspected cases of human trafficking. Additionally, all facilities must adopt certain policies and procedures that identify the workers who must receive training, require existing workers (regardless of status, job-type or compensation) to complete training by **March 18, 2018** and require new staff (employed after September 18, 2017) to obtain such training within 6 months of their first day of employment. There are also record keeping requirements.

Happily, facilities need not struggle to create their own training materials. The regulations mandate that workers take one of two alternative courses - the webinar "Recognizing and Responding to Human Trafficking in a Healthcare Context," published February 2016, by the National Human Trafficking Resource Center (NHTRC) or the online or in person training "Stop. Observe. Ask. Respond to Human Trafficking (SOAR): A Training for Health Care and Social Service Providers," published August 2016, by the United States Department of Health and Human Services.

In some instances, facilities may rely upon other entities to provide the training. Facilities that contract with vendors to provide staff to the facility should consider amending such agreements to require that the vendors have properly trained their personnel and will provide evidence of such training to the facilities. Alternatively, a facility may be able to rely upon the training provided by another licensed facility under a similar obligation.

Should you need further information, please feel free to contact [Lisa Stewart Albright](mailto:albright@archerlaw.com) at (609) 580-3710 or [lalbright@archerlaw.com](mailto:albright@archerlaw.com) or any member of Archer's [Health Care Group](#) in any of our [offices](#).