

Vendor Representatives Policy

This Policy is Applicable to Health Pointe

Applicability Limited to:	N/A
Reference #:	TBD
Version#:	1
Effective Date:	01/29/2018
Functional Area:	Clinical Operations

Purpose: To outline the process for standards and to provide direction for vendors doing business with Health Pointe. The term “Vendor(s)” shall mean any third party supplier of materials, goods, or services to Health Pointe or on Health Pointe’s premises who is not otherwise credentialed and provided access to Health Pointe’s premises to and consistent with Medical Staff Bylaws.

Responsibility: This policy is to establish expectations of our business partners that are consistent with our Code of Conduct. All vendor representatives will adhere to Health Pointe policies and procedures and will abide by the laws and regulations of the State of Michigan, Federal Government, The Joint Commission, HIPAA, Privacy Rules, and all other regulatory standards of practice.

It is the responsibility of all individuals who deal with vendor representatives to comply with this policy, including all Health Pointe employees and medical staff, board members, and volunteers.

Compliance

- I. In exchange for access to Health Pointe, representatives are required to abide by this policy. Violations are subject to disciplinary action for the individual and/or vendor and include, but are not limited to, the following: harassment of patients, staff members, or associates, aggressive marketing behaviors, failure to register/sign-in prior to entry, or any behavior deemed inappropriate.
- II. The length, type, and severity of disciplinary action for any violation of this policy are at Health Pointe’s sole discretion. Unless alternative or more severe action is deemed warranted by Health Pointe, violations of this policy will result in the following actions:
 - a. First Offense:
 - i. A letter indicating the infraction will be sent to the representative and the entity they represent
 - ii. The representative and their manager will meet with the department where the infraction occurred, along with either the Clinical Operations Specialist or Operations Specialist.

- b. Second Offense:
 - i. A letter indicating the subsequent infraction will be sent to the representative and the entity they represent
 - ii. All access to Health Pointe facilities, for the individual(s) may be suspended
- c. Any violation of this policy may affect future vendor relations with Health Pointe, at its sole discretion.

Policy Content:

- I. Requirements Applicable to All Vendors and Vendor Representatives
 - a. Prior to any/all electrical equipment being brought on site for trial or purchase, the equipment must be inspected and approved for use by Bio Med or Maintenance. Vendor should contact the Supply Chain Management representative they are working with to determine a designee to conduct the inspection.
 - b. Meetings with vendors are to be conducted by Health Pointe staff in their respective office or designated areas. Vendors are prohibited from conducting business, inclusive of the selling or marketing of products or services, in nursing units, patient care areas, nurse lounges, physician lounges, or any public areas such as cafeterias, lobbies, or mailrooms. Vendors may not enter a nursing unit or patient care area excepted as permitted in the subsection below. Any business conducted near a patient care area must be confined to an office or conference room.
 - c. All vendor representatives must sign in with Practice Manager or designee. Loading and unloading arrangements must be made with the appropriate department. Vendor should contact the Supply Chain Management representative they are working with to determine the department and designee to conduct the inspection. Vendors must abide by Health Pointe's parking policies and procedures at all times.
 - d. Vendors must schedule appointments with physicians at Health Pointe through the physician's office.
 - e. In-service education may be scheduled through the operational department with the approval of the department designee. An in-service is defined as a pre-planned, pre-arranged group presentation that may include physicians, pharmacists, nursing staff, or other health care providers the training is applicable.
- II. Prior to initiating the analysis process for any new product, the representative must communicate to Health Pointe in writing to the Compliance Officer if the sponsoring physician has any affiliation with the company e.g. owner, investor, speaker, proctor, inventor, involved in research, and/or consultant
- III. Vendors must present and process any new product utilized in direct patient care, along with physician recommendation through the appropriate analysis process for consideration of an evaluation.
- IV. Vendors must provide a product information packet to the Supply Chain Management department prior to final departmental determination concerning any supply, purchased service, or new technology product or equipment. The packet should

- include product information, list and contract pricing, as well as pertinent clinical/technical data about the product.
- V. Equipment, samples or supplies requested by Health Pointe personnel to be used for evaluation purposes must follow the appropriate purchasing procedure. Health Pointe will not pay for any product brought in without the knowledge of department management.
- VI. New and Non-Stock Products or Equipment to the Surgical Services Area
- a. The following must occur before a new product is brought to the operating room by a sales representative:
 - i. Product has been requested by a physician and approved for use by the **Standardization Product Evaluation Committee (SPEC) or Surgical Services Value Analysis (SSVA)**.
 - ii. Pricing and product information has been provided to purchasing and the sales representative has obtained a purchase order prior to any product use.
 - iii. Disposable products for trial will have appropriate lot numbers for reporting problems or malfunction.
 - iv. Electrical products have been evaluated by **Bio-Med** prior to use as evidenced by a **current inspection sticker**.
 - v. Staff have been informed and educated as needed, regarding the new product. This will be coordinated by the manager or EMI.
- VII. Requirements applicable to all Vendors and Vendor Representatives Involved with direct Patient Care or Accessing Areas of Direct Patient Care
- a. It is acknowledged that a limited number of vendor representatives may be specifically requested by Health Pointe staff or physicians, pursuant to a Health Pointe policy or procedure, to be involved with Health Pointe staff's or physician's provision of hands-on patient care via (i) conducting staff or physician training, (ii) consulting with staff or physicians concerning a specific patient, or (iii) calibrating a device (collectively, "Patient Care-Related Services"). Patient Care-Related Services may only be provided upon compliance with the below criteria.
 - b. Patient Care-Related Services must, at all times, be conducted under the supervision, direction and responsibility of a licensed Health Pointe healthcare professional or physician.
 - c. Only vendor representatives providing Patient Care-Related Services may enter nursing units or patient care areas within Health Pointe for business purposes and then, only by appointment or with authorization by the department management. Vendors shall complete the authorized business task and immediately leave the area and return to registration. Vendors are not authorized to enter staff or physician lounges or proceed into other offices or areas without prior authorization.
 - d. Prior to entering into a nursing unit, areas of direct patient care, or providing Patient Care-Related Services, a vendor representative must check in with the charge nurse/manager/EMI or designee. Minimum requirements for access to patient care areas are:
 - i. Proof of relevant training

- ii. Chicken pox vaccination documentation
- iii. Hepatitis B vaccination documentation
- iv. MMR vaccination documentation
- v. TB vaccination documentation
- vi. Proof of liability insurance covering vendor services
- vii. Proof of drug screen
- viii. Criminal background check
- ix. Acceptance of the Vendor Policy
- e. Failure to have these documents updated in the **vendor access system** will prohibit the representative from having direct patient or staff access and performing Patient Care-Related Services.
- f. Health Care Industry (HCI) representatives may be present in the operating room if the following conditions are met:
 - i. The physician requests their presence as outlined above for a specific case.
 - ii. The HCI representative or physician/office contacts the department manager or his/her designee to alert them to the date of their requested presence and to provide patient name, physician, and rationale for physician's request of their presence.
 - iii. The HCI representative will check in with the charge nurse/manager or designee on the day of the surgery/procedure.
 - iv. The HCI will be required to provide proof of required immunizations.
 - v. HCI representatives will observe Health Pointe policies regarding protective attire and infection control.
 - vi. The RN will document the name of the HCI representative and the company he/she represents on the medical record.
- g. Vendors are not allowed to operate any equipment for a procedure. Vendors are permitted to calibrate programmable devices under the direction of the attending physician. These devices include, but are not limited to: pacemakers, internal cardiac defibrillators, nerve stimulators and lasers.
- h. Patient consent should be obtained and documented in the patient's medical record regarding the presence and role of the vendor, if that person will be present during treatment, care, or a clinical procedure.
- i. Vendors will be solely responsible for personal and professional belongings brought into Health Pointe.

Procedure

- I. All vendor representatives must sign in and print a vendor ID badge from the **vendor access system**. This badge must be worn in plain sight. All vendor representatives are also required to wear their company identification badge. **The sign-in process will print a badge with the date, amount of time in the facility, individual to be visited, representative's name and company.** Appointments must be arranged in advance with each department visited. Vendors will also be required to comply with any specific departmental registration processes that may exist in addition to the **RepTrax** vendor access system.

Revisions

Health Pointe reserves the right to alter, amend, modify or eliminate this policy at any time without prior written notice.

Policy Development and Approval

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