

**TITLE: Vendor Representatives, Standards of Conduct
and Management**

IDENTIFIER: S-FW-EC-1155

EFFECTIVE DATE:

APPROVED: Executive Cabinet 1/28/20

<input checked="" type="checkbox"/> Acute Care:	ENC <u>2/11/20</u>	GH <u>2/11/20</u>
	LJ <u>2/11/20</u>	MER <u>2/11/20</u>

ORIGINAL: 04/11

<input checked="" type="checkbox"/> Ambulatory:	SMF <u>2/11/20</u>	
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REVISED: 09/13, 10/16, 04/17, 01/20

<input checked="" type="checkbox"/> Home-based Care:	HH <u>2/11/20</u>	
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REVIEWED:

<input checked="" type="checkbox"/> SHAS:	<u>2/11/20</u>	
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I. PURPOSE

To establish the acceptable rules of conduct for vendor representative, as determined by Scripps and in a manner that will minimize interruption of patient care, ensure patient safety, staff productivity and ensure that vendor contacts are consistent with Scripps business practices. Individuals considered direct patient service vendors are not subject to this policy.

II. DEFINITIONS

- A. **Vendor Representative:** for the purpose of this policy includes any representative or contracted personnel of a manufacturer, distributor or company who visits the facility for the purpose of, carrying out a service, soliciting, marketing, or distributing information regarding the use of medications, products, technical information systems, equipment or services (e.g., general contractor, food service vendor, pharmaceutical representative).

Refer to *Access to Patient Care Facilities, Non-Employee Requirements for, S-FW-EC-1157, Attachment A.*

- B. **Direct patient service vendors:** are vendor/agency staff members who come to the hospital to provide patient education or arrange post discharge services. Individuals in this group are performing a function for the purpose of continuity of care upon agreement or request of the patient.
- C. **Scripps Sponsor:** Refer to *Access to Patient Care Facilities, Non-Employee Requirements for, S-FW-EC-1157.*
- D. **Patient Care Area:** Refer to *Access to Patient Care Facilities, Non-Employee Requirements for, S-FW-EC-1157.*

III. POLICY

- A. All vendor presence and interaction in a Scripps facility must be done under the accountability of a Scripps Sponsor.
Vendors are not permitted in patient care areas unless accompanied by a Scripps Sponsor.
- B. Access requirements are established (minimum identity, health and safety requirements) for each category of personnel and visit type, in Scripps policy *Access to Patient Care Facilities, Non-Employee Requirements for, S-FW-EC-1157, Attachment A.*
- C. Vendors whose requirements have expired are not permitted in Scripps patient care facility's until valid documentation is provided.

- D. Vendors without an appointment will not be allowed into a Scripps patient care facility. They will be given the opportunity to call and make an appointment.
- E. Staff is required to report vendors who visit an area without an appointment and/or vendor pass.
- F. Scripps sponsors are responsible for:
 - 1. **Validating Vendor Requirements:** refer to *Access to Patient Care Facilities, Non-Employee Requirements for, S-FW-EC-1157, Attachment A.*
 - 2. **Vendor Activity Oversight:**
 - a. **Role:** Notify all staff that the role of the vendor role during a procedure is to provide product consultation, or to answer questions and make technical adjustments to equipment/devices deemed essential for patient care only at the direction of the physician
 - b. **Vendor Solicitation:** Vendor Representatives are **not** permitted to solicit
 - i. Scripps patients or visitors at any time
 - ii. Employees or physicians when in patient care areas.
 - c. **New Products and Equipment:**
 - i. **Prior to utilization**, Scripps Value Analysis process, which includes review of both clinical evidence and financial impact, must vet all:
 - New patient implantable devices
 - New Disposable products
 - Trials and evaluations, including investigational devices, billable procedures
 - Any new equipment never used at a Scripps facility.
 - Any equipment obtained for free due to purchases of its supporting consumable products.
 - ii. Supply Chain Management requires that all vendor invoices or delivered goods forms be provided **within 24 hours** after the case is completed.
 - d. **Bio Medical Equipment Requirements:**
 - i. All equipment must be in the facility **24 hours before a case**, in order to be approved, inspected and stickered by Biomedical Engineering.
 - ii. Biomedical Engineering will not approve the use of any medical equipment without proper documentation **or** if the scheduled/preventative maintenance cycle has expired. *Maintenance documentation must accompany the equipment and include one of the following:*
 - a.) Latest scheduled/preventative maintenance that has been performed in the time frame recommended by the manufacturer **or**
 - b.) No maintenance is required **or**
 - c.) Device is too new to have had scheduled/preventative maintenance
 - e. **Sterile Processing Department Requirements:**

- i. All instrument trays, including loaners and consignment, must be brought into the facility **48 hours before** any surgical procedure to be sterilized and properly inspected by SPD.
 - ii. All instrument trays must be free of bioburden and checked for completeness before each case.
 - iii. Loaner trays must weigh less than 25 pounds and be picked up within 24 hours after the completion of a case.
 - iv. If the loaner trays are missing instruments or are damaged, this must be reported to SPD leadership *prior to removal* of the trays from the facility.
- f. **Product/Equipment Training:** Vendors providing training (e.g. newly purchased equipment or device) in a patient care area must be accompanied by or be under the direct supervision of a Scripps Sponsor.
- g. **Vendors Providing Consultation:** (e.g. product consultation, device technical adjustments, or to answer questions deemed essential for patient care)
- Under no circumstances will a vendor be permitted to:*
- i. Participate in hands on delivery of patient care (e.g. scrub)
 - ii. Operate equipment and/or administer supplies, outside of technical adjustments at the direction of the physician.
 - iii. Provide initial training of equipment and/or supplies during a procedure
 - iv. Discuss patient information, or share patient information with anyone
- h. **Distribution of Promotional Materials:** Distribution, posting, or leaving any type of printed or handwritten material, advertisements, signs or other such promotional materials anywhere on Scripps premises is prohibited. Educational, promotional or informational materials may not be given to physicians and staff unless explicitly requested.
- i. **Patient Educational Materials:** Vendors are strictly prohibited from providing educational materials of any kind directly to patients, their families or leaving these materials in areas accessible to patients.
- j. **Pricing Information:** Vendors shall not provide comparative pricing information in their literature or in their discussions with Scripps personnel.
- k. **Noncompliance:** Vendor requirements are monitored by Scripps Sponsors and Supply Chain Management. Violations may result in the following:
- i. Notification to the vendor's parent company
 - ii. Temporary or Permanent restrictions of visitation privileges
 - iii. Escalation to the appropriate care line for further direction.
 - iv. Termination of future business
 - v. Prosecution

IV. PROCEDURES

- A. Direct all new vendors to Supply Chain Management for information on the registration process.
- B. Instruct vendors to check in at a designated location:
 - 1. Vendors under RepTrax: check in through area kiosk.
 - 2. Vendors not managed under Rep Trax will be instructed to sign in at the Security office.
 - 3. Instruct vendors to report to hospital Security Department in the event that check in is not available at the RepTrax kiosk.
- C. If vendor will be present during a procedure, they must have prior approval by the Department Directors who must validate the following:
 - 1. 24 hour advance notification of vendor request from the physician.
 - 2. Equipment approval and sticker by Biomedical Engineering.
 - 3. Staff and physician have received training from vendor prior to use.
 - 4. Proper identification of vendor (as defined in Scripps policy *Access to Patient Care Facilities, Non-Employee Requirements for, S-FW-EC-1157*)
 - 5. Vendor orientation to area
- D. Departmental leadership (i.e. supervisor, manager) are responsible for:
 - 1. Patient privacy, vendor is not allowed into procedural room until patient has been positioned and draped.
 - 2. Limiting vendor access to confidential patient information to minimum necessary.
 - 3. Limiting vendor presence in sterile environment and/or traffic of vendor in and out of sterile environment. Only one representative for each company to be present during a surgical/procedural case. Additional representatives must be approved in advance by a Scripps Sponsor.

V. RELATED PRACTICE DOCUMENTS

- A. Access to Patient Care Facilities, Non-Employee Requirements; [S-FW-EC-1157](#)
- B. Acquisition of Goods and Services, Management of; [S-FW-LD-6001](#)
- C. Information System, Non-Employees Access; [S-FW-IM-3004](#)
- D. Badge, Identification and Access; [S-FW-EC-2003](#)
- E. Solicitation And Distribution; [S-FW-HR-0907](#)
- F. Confidentiality Of Information (Patient, Financial, Employee, And Other Sensitive And Proprietary Information); [S-FW-IM-0201](#)
- G. Reviewers/Vendors*, External/On-Site Visit; [S-CM-PC-0117](#)
- H. Vendors, Pharmaceutical Service Representatives, Relations; [S-FW-EC-1156](#)
- I. Conflict of Interest and Conflict of Commitment; [S-FW-LD-1013](#)

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VI. RELATED FORMS

- A. Confidentiality and Non-Disclosure Agreement; 100-8650-061
- B. Vendor Instructions or Agreement
- C. Vendor Registration Form

VII. ATTACHMENTS

How to Get Started Working with Scripps as a Vendor

VIII. SUPERCEDED

Vendor Representatives, Standards of Conduct and Management
S-FW-EC-1155, 04/17

DEVELOPMENT SUMMARY**01/20 Revision:** No significant change of practice.**Development Workgroup**

Representation	Member Name	Member Title/Discipline
Workgroup Leader/Author	Stacy Griffin	Dir., Supply Chain Logistics
Workgroup Member	Marcia Wylie	Sr. Dir, Facilities/Support Ops
Workgroup Member	Fausto Bustamante	Dir., Biomed
Workgroup Member	Sally Super	Mgr., Clinical Services/ SPD

ENDORSEMENTS and APPROVALS

Function	Chair Name/Title/Position	Date of Endorsement and Approval
Executive Sponsor	Richard Rothberger, Corp EVP/CFO	1/23/20
Surgical Services Care Line	Lisa Thakur, Corp SVP, Ancillary Services	1/14/20
Executive Cabinet	Chris Van Gorder, President & CEO	1/28/20

**ATTACHMENT A: How to Get Started Working with Scripps as a Vendor
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As a Vendor: How To Get Started

- If you are a brand new vendor for a Scripps location, please contact the hospital's Supply Chain Department and ask for the new vendor registration information.
- Vendor representatives wanting to conduct business at any Scripps facility are required to go to RepTrax.com and register themselves as a vendor representative and 'opt in' to the Scripps organization.
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When Visiting a Scripps Facility

- At all times vendor representatives must check in and out using the RepTrax vendor management system **and** obtain an identification badge prior to conducting any business at Scripps. Vendor representatives who have already been approved for and provided a Scripps contractor badge are exempt from this provision.
- The RepTrax kiosks are listed below, if for some reason the kiosk is not available, report to the facility security department/ officer:
 - ✓ Scripps Memorial La Jolla — Hospital Lobby and Receiving Department
 - ✓ Scripps Memorial Encinitas — Receiving Department
 - ✓ Scripps Green Hospital – Main Lobby and Anderson Outpatient Pavilion (AOP) Lobby
 - ✓ Scripps San Diego, Mercy – Main Lobby
 - ✓ Scripps San Diego, Chula Vista – Main Lobby
- Vendor representatives will be required by the RepTrax system to register their name, company, destination, departmental contact, length of visit, and purpose for visiting prior to printing an identification badge.
- Identification badges must be worn in a manner that makes it easily visible at all times in any area within a Scripps facility.
- Any vendor without proper identification will be asked to leave the premises.