

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

IDENTIFIER: S-FW-EC-1155

EFFECTIVE DATE:

APPROVED: Executive Cabinet 10/18/16

<input checked="" type="checkbox"/> Acute Care:	ENC <u>11/22/16</u>	GH <u>11/22/16</u>
	LJ <u>11/22/16</u>	MER <u>11/22/16</u>

ORIGINAL: 04/11

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REVISED: 09/13, 10/16

<input checked="" type="checkbox"/> Home-based Care:	HH <u>11/22/16</u>	HSPC <u>11/22/16</u>
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REVIEWED:

<input checked="" type="checkbox"/> SHAS:	<u>11/22/16</u>
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KEYWORDS: Vendors

I. PURPOSE

Vendor representatives are guests of Scripps and, as such must provide their services in accordance with acceptable rules of conduct 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 Patient Service Representatives are not subject to this policy. Additional vendor requirements for monitoring technical information systems are addressed in the IT Vendor and Application Service Provider Management Policy S-FW-IM-9606.

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). Generally these individuals fall into Category 7, 8 or 9, *Non-Employee Access Requirements Reference Grid; SW-EC-1157*.
- B. **Visitor**: for the purpose of this policy: A visitor is an individual present in the facility as a guest of the patient/patient family. Category 1, *Non-Employee Access Requirements Reference Grid; SW-EC-1157*.
- C. **Patient Services Representative**: are vendor/agency staff members who come to the hospital to provide patients 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. For the purpose of this policy, these individuals are considered Category 2, *Non-Employee Access Requirements Reference Grid; SW-EC-1157*.
- D. **Scripps Sponsor**: A Scripps Manager or above who is responsible for establishing contractual arrangement /agreement or individual agreement with the non employee or their representing agency and coordinating or documenting the non employee access requirements. Medical Staff leadership serves as Sponsor on behalf of affiliated Scripps physicians.

- E. **Patient Care Area:** Include, but are not limited to, inpatient care units, outpatient clinics, treatment areas, surgical suites, cardiac catheterization laboratories, special procedure areas, waiting rooms, hallways, or other areas where a care giver interacts with a patient or family member.

III. POLICY

- A. All vendor presence and interaction in a Scripps facility must be done under the direction of a Scripps Sponsor and in compliance with this policy and procedures.
- B. In accordance with non employee category and visit type, Scripps leadership establishes minimum identity, health and safety requirements for all personnel. Refer to *Non-Employee Access Requirements Reference Grid* for summary of requirements as established for each category of personnel.
- C. Vendors without an appointment will be turned away or given the opportunity to call and make an appointment. Staff is required to report vendors who visit an area without an appointment and/or vendor pass. Vendors whose requirements have expired will not be able to check in and are not permitted on Scripps patient care facility's until valid documentation is provided.
- D. Scripps sponsors are responsible for:
 - 1. **Validate Vendor Requirements:** Establishing a process to validate vendor requirements on an annual basis, to include:
 - a. Background Screening requirements
 - b. Health Screening
 - c. Contractual and Competency Validations
 - d. Department orientation and safety
 - e. Badge requirements
 - f. Confidentiality
 - 2. **Vendor Activity Oversight:** Coordination of vendor requests or presence in a Scripps facility in compliance with Scripps policies to include:
 - a. **Role:** Ensure that all staff is aware of the vendor role during a procedure; 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 Scripps patients or visitors, nor are vendors permitted to solicit employees or physicians in patient care areas. Vendors are not permitted in patient care areas unless accompanied by a Scripps Sponsor.
 - c. **New Products and Equipment:** All new patient implantable devices, disposable products, all trials and evaluations, including investigational devices, billable procedures and any new equipment never used at a Scripps facility must go through the Scripps value analysis process which includes a clinical evidence and financial review prior to utilization. This also includes, any equipment obtained for free due to purchases of its supporting consumable products.

Supply Chain Management requires that all vendor invoices or delivered goods forms be provided within 24 hours after the case is completed.

- e. **Bio Medical Equipment and Sterile Processing Department Requirements:** Vendors must comply with our sterilization and biomedical engineering protocols, therefore, all equipment brought into the facility must be in the facility 24 hours before a case, in order to be approved, inspected and stickered by Biomedical Engineering or sterilized and properly inspected by SPD before any surgical procedural case. All instrument trays, including consignment, must be free of bioburden and checked for completeness before each case. Loaner trays must weigh less than 25 pounds and be picked up within 24 hours after the completion of a case. 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. Medical equipment must arrive no less than 2 hours before the start of the case and maintenance documentation must accompany the equipment. This can include:
- i. The proof that no maintenance is required.
 - ii. The device is too new to have had scheduled/preventative maintenance.
 - iii. The latest scheduled/preventative maintenance has been performed in the time frame recommended by the manufacturer.
- Biomedical Engineering will not approve the use of any medical equipment without proper documentation or if the scheduled/preventative maintenance cycle has expired.
- f. **Product/Equipment Training provided by vendor:** A Vendor may be required to provide training on new equipment, or device already purchased by the Facility, setting up such equipment, or similar activities associated with products and equipment. Vendors invited to a patient care area must be accompanied by or under the direct supervision of a Scripps sponsor.
- g. **Vendors Providing Consultation:** When the vendor is providing product consultation, device technical adjustments, or is present 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**
- Vendors shall not be permitted to distribute, post or leave any type of printed or handwritten material, advertisements, signs or other such promotional materials anywhere on Scripps premises. Unsolicited

educational, promotional or informational materials may not be given to physicians and staff unless explicitly requested.

h. 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.

i. Restricted Vendor Information

Vendors shall not provide comparative pricing information in their literature or in their discussions with Scripps personnel.

j. Noncompliance

Violations of the vendor requirements are monitored by the Scripps sponsors as well as Supply Chain Management and violations may result in the following:

- i. Notification to the vendor's parent company
- ii. Temporary or Permanent restrictions on visitation privileges
- iii. Elevation to the appropriate careline for further direction.
- iv. Termination of future business
- v. Prosecution

IV. PROCEDURES

- A. A vendor may only visit a Scripps location with a scheduled appointment with the Scripps sponsor.
- B. Direct all new vendors to Supply Chain Management, where they will receive information on the new vendor registration process.
- C. 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.
- D. 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 of the physician for vendor presence/equipment.
 2. Equipment approval and sticker by Biomedical Engineering.
 3. Staff and physician training of equipment provided by a vendor prior to use.
 4. Proper identification of vendor (commensurate visit type and health requirements)
 5. Vendor orientation to area
 6. Supervising department staff are responsible for coordinating presence of the vendor:
 - a. To afford patient maximum privacy, vendor is allowed in the room only after the patient has been positioned and draped.

- b. Limited exposure of confidential information to the vendor as minimum necessary, and
 - c. Limited 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 case. Additional representatives must be approved in advance by a Scripps sponsor.
- E. Instruct vendors to report to hospital Security Department in the event that check in is not available at the RepTrax kiosk.

V. RELATED POLICIES

- A. Medical Equipment, Vendor Requirements and Competency S-FW-EC-6107
- B. Vendors, Pharmaceutical Service Representatives, Relations; S-FW-EC-1156
- C. Medical Equipment, Incoming inspection of; S-FW-EC-6202
- D. Reviewers/Vendors*, External/On-Site Visit; S-CM-PC-0117
- E. Information System Resources, Administering Access Privileges For Non-Employees; S-FW-IM-3004
- F. Access to Patient Care Facilities, Non-Employee Requirements; S-FW-EC-1157
- G. Badge, Identification and Access; S-FW-EC-2003
- H. Conflict of Interest and Conflict of Commitment; S-FW-EC-0908
- I. IT Vendor and Application Service Provider Management Policy; S-FW-IM-9606

VI. RELATED FORMS

- A. Confidentiality and Non-Disclosure Agreement; 100-8650-061
- B. Non-Employee Access Requirements Reference Grid; SW-EC-1157
- C. Vendor Instructions or Agreement
- D. Vendor Registration Form

VII. ATTACHMENTS

- A. How to Get Started Working with Scripps as a Vendor

VIII. SUPERCEDED

- A. Vendor Representatives, Standards of Conduct and Management; S-FW-EC-1155 09/13

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DEVELOPMENT SUMMARY

10/16 Revision: Vendor activity oversight enhanced to address solicitation, new products and equipment, biomed and sterile processing department. Procedures revised for clarification of workflow. Additionally, new requirement added that Supply Chain Management requires that all vendor invoices or delivered goods forms be provided within 24 hours after the case is completed.

Development Workgroup

Representation	Member Name	Member Title/Discipline
Workgroup Leader/Author	Eric Yang	Manager Contracting
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Workgroup Member	Brad Ellis	Corporate VP, Assistant General Counsel
Workgroup Member	Pete Cardiasmenos	IS Project Manager
Workgroup Member	Josh Spangler	Director Procure to Pay
Workgroup Member	Jan Coughlin	Sr. Dir, Corporate Compliance/ Privacy
Workgroup Member	Marcia Wylie	Sr. Dir, Facilities/Support Ops
Workgroup Member	Ken Hare	Mgr, Central Processing
Workgroup Member	Frank Powell Hamilton	Exec Dir, Chief Info Security

ENDORSEMENTS and APPROVALS

Function	Chair Name/Title/Position	Date of Endorsement and Approval
Executive Sponsor	Bruce Rainey, Corp VP, Construction/Facilities	10/18/16
Executive Cabinet	Chris Van Gorder, President, CEO	10/18/16

**Attachment A: How to Get Started Working with Scripps as a Vendor
Vendor Representatives, Standards of Conduct and Management**

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As a Vendor: How To Get Started

- If you are a brand new vendor for a Scripps location, please stop by 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.
- The Scripps sponsoring department will evaluate your application and inform you of the requirements for presence in a Scripps facility.

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 annual 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 — Emergency Department Security Desk
 - Scripps Green Hospital – Security Office and Facilities Department
 - Scripps San Diego, Mercy – Building Operations Center
 - Scripps San Diego, Chula Vista – Receiving Department
- 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.