



The University of Chicago Medical Center Policy and Procedure Manual

VENDOR RELATIONS POLICY

Date Effective: July 1, 2007

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I. PURPOSE

The detailing of products and services at University of Chicago Medical Center (UCMC) by company representatives is a granted privilege, not a right. Because of the high level of activity related to this function, the following guidelines are necessary to provide fair and equal opportunity for company representatives to conduct business with UCMC, while permitting UCMC to carry out its missions of patient care, research, and education. Sales representatives as guests of UCMC are expected to be aware of their role and conduct themselves accordingly. This policy applies to clinical and non-clinical work areas.

II. POLICY

Initial Registration/Certification

Companies must be certified with the Purchasing Department prior to engaging in any promotion or information activities – hereafter called “Certification” – involving their company’s products and services at UCMC. All Company. Purchasing will utilize an outside organization called **Vendormate** for purposes of Certification. Registration cannot be completed until **Vendormate** has certified the company. Once Certification has occurred a one-hour interview/training session with a Buyer is required. Training requires an advance appointment which may be arranged by contacting the Purchasing Department at (773) 702-9400. Following training the company representative will be required to sign a “Declaration of Understanding and Compliance with Policies for Company Representatives”, form denoting agreement to abide by the polices set forth in this document.

Note: New representatives of Certified Companies must go through registration.

Arrival and Identification Badge

Upon arriving at the Medical Center ALL vendors are required to either park at a city meter or park using valet parking. Self parking in the Medical Center garages is strictly prohibited and will result in immediate loss of visitation privileges. This parking is restricted to patient, patient family and limited staff parking ONLY.

Company representatives must check in at the Purchasing Department office located in the Albert Merritt Billings Building (AMB), Room M100 upon each visit to obtain an official hospital identification badge. Vendor Badges must be visible at all times. Purchasing support staff will verify via telephone that the representative has a scheduled appointment with an UCMC staff member. This badge should be picked up after 8:00 am and returned by 5:00 pm the same day. Vendors will be required to leave their Drivers License with Purchasing in exchange for the Vendor Badge. The office is open Monday through Friday except holidays. This badge must be worn and visible at all times while conducting business activities at UCMC.

When a company representative has an early morning or a late evening appointment at UCMC before the Purchasing Department opens at 8:00 am or after the Purchasing Department closes at 5:00 pm the Vendor representative must notify Purchasing 24 hours in advance. The Vendor representative may pick the badge up at the Mitchell Hospital Security Desk. Vendors will be required to leave their Drivers License with Public Safety Officer at the Security Desk in exchange for the Vendor Badge. Refer to section III for Perioperative Services and Pharmacy Services access.

III. APPOINTMENTS

Company representatives are not permitted to enter any areas without a scheduled appointment. However, the UCMC staff member does have the authority to schedule appointments at a location of their choice. If in a patient care area, necessary steps to assure patient confidentiality and privacy will be requested. Representatives may also be required to adhere to the same hospital policies governing employees, faculty, and students regarding immunizations and other health requirements when in patient areas, e.g. rubella immunization, TB skin test.

Loitering in UCMC corridors, cafeterias, and Lobbies in an attempt to facilitate a nonscheduled meeting or to conduct Business with an UCMC staff member is prohibited.

Active Clinical Staff, Residents, Fellows and Medical Students

Clinical staff physicians and Medical Students in all clinical departments are to be contacted by appointment **only**. The representative **must have a prior appointment** with the clinical staff before proceeding to the department. Representatives may not go to the department area to make an appointment. Clinical staff should be contacted for appointments by mail, email, or telephone. An appointment with one clinical staff member does not grant permission to meet with other clinical staff/medical students in that department. Medical students, at the request of Clinical Staff may be included in appointments with vendor representatives. Company representatives must leave the area immediately upon completion of an appointment.

Nursing Staff

Nursing Department staff is to be contacted by appointment only. The company representative **must have a prior appointment** with the staff nurse before proceeding to the department. Company representatives may not go to a departmental area to make an appointment. Nursing staff should be contacted by mail, email or telephone. An appointment with a particular staff nurse does not grant permission to meet with other nurses in that department. The company representative must leave the area immediately upon completion of an appointment.

Perioperative Services Staff

Perioperative Services Department staff is to be contacted by appointment only. The company representative **must have a prior appointment** with a member of the Perioperative staff before proceeding to the department. Company representatives shall make appointments via Perioperative Department Secretaries. An appointment with a particular staff member does not grant permission to meet with other staff members in the Perioperative Services department. The company representative must leave the area immediately upon completion of an appointment.

REGULATIONS FOR PHARMACEUTICAL REPRESENTATIVES

POLICY

Pharmaceutical representatives will be permitted to demonstrate their products to members of the medical, nursing and pharmacy staffs on a regular basis (Tuesdays and Thursdays 8AM – 5PM). The Department of Pharmaceutical Services must approve deviations from these approved days. It is the responsibility of the pharmaceutical representative to contact the Department of Pharmaceutical Services (773-702-6242) prior to this date to provide this information.

REGISTRATION

All pharmaceutical representatives must be registered with the Department of Pharmaceutical Services in room TE026 (Sub-basement of Mitchell Hospital). All pharmaceutical representatives must complete the Pharmaceutical Representative Form (attached). In addition, pharmaceutical representatives will receive a copy of this policy and will sign a statement that they are aware of, and agree to abide by, all policies and procedures included in this document.

Pharmacy stores and/or Drug Information Service will see representatives on Tuesdays and Thursdays by appointment. Other pharmacy staff may also be seen by appointment. Representatives are not allowed in other areas of pharmacy without a supervisor being present.

Requests for appointments with the medical staff may originate from the medical staff itself, through the pharmacy or by the representative prior to the date of the appointment, and such meetings should be conducted in private offices or non-patient care areas. *Representatives are not permitted in patient care areas. Deviation from this access restriction must be approved by Pharmacy management for the specific visit prior to the time of visit. Additionally, representatives must be escorted at all times by their host. All floors of Mitchell/Comer Hospitals, including the Emergency Departments, are considered patient care areas.* In the Duchossois Center for Advanced Medicine (DCAM), representatives are only allowed behind the reception desk of the clinics with the permission of the medical staff or charge nurse. A staff member must accompany representatives and their presence limited to one area, which is secluded from patients and not disruptive to the medical or nursing staffs. Drug samples must be dispensed in compliance with the Hospitals' Drug Sample Usage and Record Policy.

Pharmaceutical representatives are required to wear at all times company-provided identification, which includes name of the representative and company. Additionally, pharmaceutical representatives must sign-in at the Hospitals' or Duchossois Center for Advanced Medicine's entrances with the Public Safety Officer and receive a UCH vendor badge. This, too, must be worn at all times with the medical center.

PRODUCT INFORMATION

Marketed Products: The Drug Information Service of the Pharmacy is the source of information for healthcare professionals. The medical staff may be informed of these additions or changes in previously marketed products. The Drug Information pharmacist should be advised of all new products, changes in product literature, and changes in previously marketed products.

Investigation Drugs: Pertinent detailed information on all investigational drugs must be forwarded to the department for filing and reference purposes. This includes information on studies that are not being operated through the department

Drug Displays: At specific intervals, medical representatives will be allowed to set-up displays to which medical faculty and house-staff will be invited. At these times there will be opportunities for representatives to discuss their products with the house-staff.

STOCKING OF NEW PRODUCTS

New drug products will be stocked in the pharmacy in accordance with procedures established by the Subcommittee on Pharmacy and Therapeutics. The Department of Pharmaceutical Services is the sole source of supply for all medications and intravenous solutions used in the University of Chicago Medical Center.

PHARMACY INVENTORY

Pharmaceutical representatives are permitted in the office area of the pharmacy. Representatives are not permitted to check stock levels of their company's products or to access records of purchases.

PHARMACEUTICAL REPRESENTATIVE REGISTRY FORM

It is the responsibility of each representative to update the Registry Form as the occasion arises. This information is essential to the pharmacy, but is only of value if the information is current. When changes are necessary in the Registry Form, the pharmacy department's front-desk person is to be advised of this information.

POLICY ADHERENCE

It is the expectation that Pharmaceutical Representatives will comply with the policy. The Director of Pharmaceutical Services will oversee this policy and its compliance. Disciplinary measures will be taken to ensure compliance with this policy. For the first offense, the representative will lose the use of his ID badge for 1 week; for the second offense - 1 month; and for the third offense - 1 year. The fourth offense will result in permanent revocation of privileges.

Hospital personnel should contact the Director of Pharmaceutical Services at 773-702-6242 if representatives are seen violating these policies.

Purchasing Department Staff

The Purchasing staff is available to meet with company representatives during the hours of 8:30 am to 5:00 pm by appointment only.

IV. VENDOR RULES

Note: Access to patient care areas is strictly prohibited unless requested by clinical staff for educational purposes. These areas include: All Adult and Pediatric Nursing Units, Emergency Departments, Outpatient Sites, General Operating Rooms, DCAM Operating Rooms, Comer Operating Rooms, Radiology and all other inpatient/outpatient areas.

Vendor representatives are to be in the General Operating Room, the DCAM Operating Room, Adult Cardiac Catheterization Lab, Pediatrics Cardiac Catheterization Lab, Electrophysiology Lab and all Center for Advanced Medicine (DCAM) procedure areas only when invited by a Surgeon, Physician, Anesthesiologist, or Management Team member, for sanctioned purpose only:

- In-service new product or device including pharmaceuticals
- Technical consultation sanctioned by surgeon, physician or management team member
- Department of Surgery, Nursing Department, Management Team member or Materials Management Department sanctioned product needs assessment and/or educational in-services

This includes only:

- New procedure with current product or device
- New instruments
- Complex procedure requiring technical consultation
- Product and equipment trials
- Research and field tests of unreleased products or devices
- Current product review
- Other by approval

Representatives are permitted to offer technical advice to the surgical/procedure team regarding their equipment or devices while in use on a patient. **Representatives are NOT permitted to operate any equipment or devices.**

Educational or research programs may necessitate representatives to have access to confidential patient information. Under no circumstance are representatives to have access to confidential patient information unless a signed HIPAA agreement is on file in the Purchasing Department and/or Hospital Compliance Office. Representatives must also comply with hospital patient and/or medical staff consent policies.

- Representatives are not permitted to operate any UCMC equipment.
- Representatives are not to touch patients at any time.
- Representatives may not scrub on any procedure.

If the new product is an implantable, the OR Supply Chain Team (ORSCT) must approve it. If the device is investigational, pre-approval must be obtained by the Investigational Review Board (IRB) and the Vice President of Perioperative Services. All non-implantable supplies and devices must have pre-approval from the ORSCT. Each company must receive a UCMC no-charge PO prior to use of any demo equipment and/or supplies. The Medical Center will not pay for any device that is not used or implanted during the specific procedure. No "extras" may be left in the department for "inventory" purposes. Leaving excess devices behind will constitute a gift to the Medical Center.

All new medical equipment and demo equipment must be reviewed and approved for use by the UCMC Clinical Engineering Department prior to its use.

The Vendor Representative must provide nursing staff involved in the procedure with an in-service on new devices or pieces of equipment prior to the beginning of the surgical procedure. This must be coordinated with the Office of Nursing Education and Professional Development for all Nursing units and the Perioperative Education department.

Instruments or supplies needing sterile processing must be received at least 24 hours prior to surgery.

Attendance at Hospital Meetings

Attendance at Grand Rounds and departmental meetings is by invitation only.

Product Evaluation for Stock and Non-Stock Products

Company representatives are aware of the costs associated to UCMC for in-use evaluation of their products. Therefore, these products and/or pharmaceuticals must be provided at no cost to UCMC. Products that are to be evaluated in an actual clinical setting are to be delivered in properly sealed cartons, paying particular attention to packaging that assures the integrity of sterile products until the point of use.

Representatives may not accept any order (verbal, phone, electronic, fax or written) for products or pharmaceuticals unless an official purchase order is authorized and assigned by Purchasing or Pharmacy, respectively.

All pharmaceuticals must be coordinated through the Pharmacy Department. With exception of selected outpatient clinical trial medications, all drugs must be delivered directly to Pharmacy. Drug samples may only be utilized in outpatient settings when requested by Attending faculty members; however they must be registered with the Pharmacy prior to delivery to the requesting physician.

Addition of New Products

New products/pharmaceuticals are considered for addition only after review by the appropriate Supply Chain Team or the Pharmacy and Therapeutics Committee who have the authority to approve new products for use at UCMC.

Educational In-services

Educational in-services must be requested and coordinated by authorized persons and shall not be promotional in nature.

Non-Formulary medications may not be in-serviced without permission of and attendance by a Pharmacy manager.

Note: ***Rooms must be left clean and orderly at the conclusion of the in-service program.***

Violation of Policies

These policies and regulations for company representatives are to be followed rigidly. All UCMC staff will assist in monitoring the level of compliance. In the event that a member of the UCMC staff observes a vendor in an UCMC work area without an UCMC approved Vendor Badge, the staff member should do the following:

- Ask the vendor if they are aware of the Vendor Visitation Policy (If not, they should be directed to the Office of the Director of Purchasing, located in the AMB Room M100, phone number 773/702-0919)
- Ask the vendor for his/her name and company and request that they leave the area immediately
- Notify the Department of Purchasing (773/702-9400) with the vendor information

Gifts and Compensation

Personal gifts from Vendor companies **including Food/Meals** are prohibited and may not be accepted by any UCMC employee.

Violation of Patient Privacy (HIPAA)

Violation of any patient privacy will result in **IMMEDIATE** loss of visitation privileges.

Failure to comply with all other sections this policy can result in the following actions:

- a. **First infraction** – Loss of visitation privileges for one month
- b. **Second infraction** – A letter of reprimand with a copy being sent to the company representative's immediate supervisor, and loss of visitation privileges for three months
- c. **Third infraction** – A letter of reprimand with a copy being sent to the company representative's immediate supervisor with a request of change of vendor representative. Failure to do so will result in loss of certification for the Company and will no longer be able to do business with UCMC.

PERSONS RESPONSIBLE

Director, Purchasing

Director, OR Management

Director, Pharmacy

PERSONS RESPONSIBLE FOR REVIEW OF POLICY

Vice President Support Services

Vice President, Perioperative Services

Chief Pharmacy Officer

Director, Purchasing