

Ascension Health Vendor Access Policy

Purpose:

The purpose of this policy is to set forth guidelines for relationships with Health Care Industry Representatives (HCIR). Ascension Health desires to provide a safe and effective environment for patients, associates, physicians and other allied health professionals, while complying with regulatory guidelines. This Vendor Access Policy is part of a continual processes improvement towards that end.

Objectives:

- To establish a structured system throughout Ascension Health for education, training, and introduction of products, procedures, techniques, technology, and equipment to our associates and physicians.
- Define conditions and requirements HCIRs must abide by to provide training, knowledge transfer, expertise, products and/or services within Ascension Health facilities.

Definitions:

Ascension Health: This term will be used throughout this document and is intended to include Ascension Health as a multi-hospital health system, each of our Health Ministries and/or individual locations dependent on the context of its use.

Associate(s): Includes practicing health care professionals and employees working at Ascension Health facilities.

The Resource Group Lead: The Resource Group associate responsible for managing vendors within the Health Ministry or facility.

Symplr: The Resource Group contracted vendor management/vendor credentialing system.

Health Care Industry Representative (HCIR): This is an industry accepted term used to refer to a sales or service professional that represents a company or companies to The Resource Group and/or Ascension Health associate(s) including: physicians, nurses, buyers, purchasing agents, executives and other associates that may be general users or influencers of the company's product. HCIRs represent manufacturers, distributors, service companies, and other organizations. HCIRs generate sales, manage contracts, provide quotes, demonstrate products, make repairs, consult, and perform many other duties generally associated with representing their company. For the purposes of this policy, three (3) classifications of HCIRs are defined:

Classification 1: Non-clinical, Credentialed, Health Care Industry Representatives: HCIRs that do not serve primarily in clinical support roles but engage The Resource Group and/or Ascension Health associates in a manner that requires some level of credentialing.

Classification 2: Clinical, Credentialed, Health Care Industry Representatives: HCIRs that may serve in clinical support roles. The roles of these HCIRs require them to typically work in patient care areas, and/or provide assistance to or consult with patient care associates.

Classification 3: Non-Credentialed Representatives:

These representatives are typically delivery personnel or visiting administration. This classification will be utilized on an exception only basis.

Ascension Health's selected vendor credentialing system, Symplr, further defines classifications by access levels. The Symplr level definitions incorporate contracted personnel. (See addendum A)

Policy

Key Points and Rules

- a. It is the responsibility of each HCIR to properly register with Symplr and be credentialed at the appropriate Symplr Level for access to Ascension Health facilities and personnel.
- b. HCIRs will not be provided free or unlimited access to any floor, area, suite, or operating room within Ascension Health. No standing appointments are permitted. HCIRs will only be permitted to meet with Associates in The Resource Group Department or other areas as designated or approved by The Resource Group Lead or his/her designee (e.g. Director of Pharmacy, Operating Room Directors, etc.). Access to Ascension Health non-supply chain personnel will only be permitted through Symplr scheduling with approval of The Resource Group Lead or his/her designee (e.g. Director of Pharmacy, Operating Room Directors, etc.).
- c. HCIRs must bring any instrument and/or implant to the sterile processing department for wrapping and sterilizing 24 hours in advance of procedure. Flash sterilization is prohibited except in the event of an emergency.
- d. Any HCIR seeking access to an Ascension Health Ministry for the purpose of performing maintenance services must have an appointment, scheduled at least thirty (30) days in advance, with The Resource Group Lead, or his/her designee (e.g. Director of Pharmacy, Operating Room Directors, etc.). Emergent and unexpected repairs may be approved by The Resource Group Lead, or his or her designee, on a shorter timeline.
- e. HCIRs are not permitted access to any operating room or surgical suite within Ascension Health without approved appointments within Symplr.

- f. In-services will require authorization from The Resource Group Lead, or his/her designee (e.g. Director of Pharmacy, Operating Room Directors, etc.). HCIRs will schedule an in-service at least 30 days in advance with The Resource Group Office. All in-services will be conducted in The Resource Group Department or designated education area.
 - i. All associates attending in-services will be provided CEUs by the HCIR's education department and the appropriate accrediting organization.
 - ii. HCIRs are not permitted to present or support any medication related educational programs for pharmacy associates, nursing or other healthcare professionals (excluding physicians)
 - a) In-services on medication related devices that require training on preparation or administration technique (ex. vial-to-bag, ADDVantage) or operation (Pyxis, cactus) may be provided, at the discretion of the Director of Pharmacy in consultation with The Resource Group Lead or designee.
- g. Pharmaceutical HCIRs may not solicit any Ascension Health pharmacy associate to participate in speaking engagements, speaker's bureaus, consultantships, or advisory panels.
- h. Pharmaceutical HCIRs are prohibited from providing funding or support for pharmacy associate attendance at workshops, seminars, conferences, and symposiums that are conducted and fully funded by a pharmaceutical manufacturer.
- i. Any distribution of samples and literature shall be coordinated and arranged through The Resource Group Lead. Pharmaceutical samples are prohibited in all Acute Care Facilities. Exceptions for the following reasons:
 - i. Sample medication used for the Dispensary of Hope
 - ii. Programs (ex. dofetilide) that have an associated Risk Evaluation and Mitigation Strategy (REMS) that requires a starter pack to bridge therapy for several days between the hospital and home therapy.
- j. HCIRs are strictly prohibited from providing demonstration model or loaner equipment to Ascension Health without having submitted a proposal for such equipment to The Resource Group Lead and having received a zero dollar purchase order for such equipment prior to its arrival on the premises. All equipment brought in for demonstration/evaluation must have a safety check completed by biomedical engineering before the equipment can be used at Ascension Health.
- k. Vendor Products and/or services not expressly included within a contract executed between The Resource Group, Ascension Health, one of its Health Ministries, or a designated GPO, and the vendor or product for which no purchase order was issued in advance (collectively referred to herein as "off contract products") may not be introduced or provided to the members of the medical staff or associates of Ascension Health for use. Any off contract

products that are provided to and used by associates in violation of Ascension Health policy shall be deemed vendor donated product. Vendor shall not invoice for, nor receive any reimbursement for such off contract product from Ascension Health.

- i. The Resource Group recognizes that there may be instances where patient care dictates use of an off contract product. In such rare circumstances, the Health Ministry physician requesting use of the off contract product, with assistance from the HCIR, may apply for an exception to the off contract product policy. Please be aware that the exception process is time consuming and may take up to one hundred and eighty (180) days to resolve.
- l. The Resource Group initiates business with vendors by seeking bids or proposals from potential sources and awards contracts based on a variety of criteria. Copies of bids, quotations, special offers, etc. must only be submitted to The Resource Group or the Health Ministry's The Resource Group Leader regardless of the original requestor.
- m. Vendors shall submit all product recall notices to The Resource Group Leads and to the attention of the appropriate hospital department designee within three days of notice. Please refer to Health Ministry's specific protocol.
- n. HCIRs are not permitted to take still or video pictures within the hospital without prior authorization from Ascension Health's legal department.
- o. Gifts, Items of minimal value, (e.g. pens, notepads, and similar "reminder" items with company or product logos), and gratuities, of any kind are prohibited. Food and displays are also prohibited unless formally approved by The Resource Group Lead or his/her designee (e.g. Director of Pharmacy, Operating Room Directors, etc.), and applicable department director(s). Approval shall be provided on an exception only basis.
- p. HCIRs are prohibited from soliciting associates for pricing information or documents from meetings or other discussions.

Before Arriving

- a. HCIRs must log in to Symplr and generate an appointment request prior to each requested appointment. All vendor appointment requests will be reviewed by The Resource Group Lead, or his/her designee (e.g. Director of Pharmacy, Operating Room Directors, etc.), through the use of the Symplr tool. Information required of vendor for successful appointment request will minimally include:
 - i. Date of HCIR visit
 - ii. Purpose of the visit
 - iii. HCIR destination at the facility
 - iv. Time of entry to the facility

- v. Time of exit from the facility by the HCIR
- b. No HCIRs shall be given access to Ascension Health without the successful completion of the Ministry's vendor credentialing program and strict continued compliance to Ascension Health rules, standards, policies, and procedures.
- c. HCIRs visiting Ascension Health must have an approved appointment prior to arrival on the premises.
 - i. HCIRs must review Ascension Health parking policies for any visit.

Upon Arrival

- a. HCIRs must comply with Ascension Health parking policies.
- b. A vendor credentialing system will usually be located in The Resource Group Department, which may be at a different location than the main campus. An additional system with limited access will also be located in the Operating Room.
- c. HCIRs must register in at Ascension Health's designated Symplr access point in The Resource Group Department or, when circumstance permits, near the operating room to receive their time/date sensitive identification for the appointment.
- d. HCIRs are required to wear at all times the time stamped badge while on the Ascension Health Campus.

While at the Ascension Health facility

- a. HCIR is required to wear the time sensitive badge generated by the Symplr system throughout their visit to the facility.
- b. Classification 1 and Classification 2 HCIRs are required to comply with department specific policies.
- c. Classification 3 HCIRs are not permitted in areas where patient care is provided.
- d. Medical staff, house staff, other associates, and visitors shall not be approached on the Ascension Health premises outside of Supply Chain. HCIR activities outside of approved appointments are prohibited.
- e. HCIRs are not permitted on patient care areas, nursing units, in the emergency room, in outpatient clinics or other patient treatment areas where patient care is provided unless specifically requested by the hospital medical, clinical, or administrative staff to support a patient procedure.

- f. HCIRs may be present but shall not wait in common hospital areas or physician lounges (such as building lobby areas, eating areas, parking areas, public telephone areas, OR, etc.) for the purpose of initiating unsolicited contact with health care professionals and detailing these individuals on their products.
- g. HCIRs will respect and abide by the decisions of the relevant Medical Executive Committees and their subcommittees (e.g. the Pharmacy and Therapeutics Committee).
- h. HCIRs are not permitted to promote medications or supplies, in a manner that is contrary to Ascension Health or local ministry policies, guidelines, or formulary, as approved by the relevant hospital or system level committees.
- i. Before visiting members of the medical staff or Associates to promote medications, HCIRs must meet with the Director of the Pharmacy, or designee, to inform and provide them with any of the information they will be using to promote their product(s). Any information or material that is deemed inappropriate biased or in conflict with ministry strategy and mission by the facility pharmacy director or designee may not be provided to individuals in the ministry.

Before Leaving

- a. HCIRs must log out at a Symplr access point at the conclusion of each scheduled appointment.

Non-Compliance Ramifications

- a. HCIR non-compliance to this policy will result in the following consequences:
 - i. First Violation: The Resource Group Lead will notify the Health Ministry Chief Resource Officer and the System Office of HCIR non-compliance of policy. HCIR will be placed on probation for 30 days during which time they will not be able to conduct business at any Ascension Health facility. At The Resource Group Lead's discretion all HCIR's from the offending company may be placed on probation for 30 days during which time they will not be able to conduct business at the ministry.
 - ii. Second violation: HCIR will be suspended from further business with Ascension Health. At The Resource Group Lead's discretion all HCIR's from the offending company may be suspended from further business with the ministry.
 - iii. Repeated violations by multiple HCIRs from the same company will result in all HCIRs from that company being banned for a period of one year from all Ascension Health facilities, or indefinitely if warranted.
- b. Based on the severity of the violation, The Resource Group Lead may determine an immediate suspension is warranted. Any HCIR found in the violation of this policy or found to be inappropriately visiting a Health Ministry location may be charged with trespassing regardless of the number of violations.

HCIR signature/Symplr acknowledgment of policy

I HAVE READ AND UNDERSTAND THE ABOVE REQUIREMENTS AND AGREE TO THE TERMS STATED THEREIN.

SIGNATURE: _____

DATE: _____

PRINT NAME: _____

POSITION: _____

COMPANY: _____

Addendum A

Vendor Credentials

- **All Access** – Enables access to all areas in a facility. Typically this access level is provided to people who need access to procedure and patient care areas to support clinical staff.
- **Patient Care Access** – Enables access to engage with staff in patient care areas or areas where access to Protected Health Information is available. This does not provide access to any procedure areas.
- **Administrative Access** – Enables access to all general and administrative areas of a facility. No access to patient care or procedure areas is provided.
- **Provider Access** - Enables access to physician offices, but does not provide access to procedure, patient care areas, or general administrative areas of your facilities.

Contractors, and Other Non-Patient, Visitor, or Hospital Associate

- **Standard Credentialing** – Provides that the facility policy was read and signed, online training courses, background checks, and exclusion screening. This level is typically used for delivery drivers and temporary administration staff.
- **Comprehensive Credentialing** – Provides that the facility policy was read and signed, online training courses, background checks, and exclusion screening. This level is typically used for volunteers, students, researchers, and contractors.
- **Full Credentialing** – Provides that the facility policy was read and signed, online training courses, background checks, and exclusion screening. This level is typically used for nurses, hospice, IT consultants, and device maintenance technicians.